

EPA Reg Jacket 83122-1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Robin Todd, Ph.D.
Agent for Garnik Industries, LLC
1330 Dillion Height Avenue
Baltimore, MD 21228-1199

SEP 26 2012

Subject: **Amended Reregistration Label for Pro-Tek 50 Fabric/Apparel (Garment) Treatment
D413202
EPA Reg. No. 83122-1**

Dear Mr. Rose:

The Agency, in accordance with the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), as amended, has completed reviewing all of the information submitted with your application to support the reregistration of the referenced product in connection with the **Permethrin RED**, and has concluded that your submission is acceptable.

PLEASE NOTE: This product is not being reregistered under sections 3(c)5 and 4(g) of FIFRA at this time.

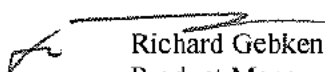
PLEASE NOTE: That the record for this product currently contains the Confidential Statements of Formulation (CSFs) listed below. Any previously dated CSF's are superseded.

- Basic CSF, dated August 4, 2011

A copy of your label stamped Acceptable is enclosed. Products shipped after 12 months from the date of this amendment or the next printing of the label whichever occurs first, must bear the new revised label. Your release for shipment of the product bearing the amended label constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e).

If you have any questions about this letter, please contact Linda A. DeLuise at (703) 305-5428 or via e-mail at deluise.linda@epa.gov or Mr. Richard J. Gebken at (703) 305-6701 or via e-mail at Gebken.Richard@epa.gov.

Sincerely yours,


Richard Gebken
Product Manager 10
Insecticide Branch
Registration Division (7505P)

Enclosure: Label stamped Accepted dated: September 26, 2012

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

EPA Reg. No. 83122-1

{Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS). The following statements are product descriptors describing each sub-label and are not required language for product labels.}

SEP 26 2012

83122-1

EIGHT TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS**1. Bed Band**

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band available in appropriate width for mattress thickness). Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated flat, bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Treated two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip pouch closed, or secure bottom edge of protector with stitched gathered elastic. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. If no box spring, use under mattress pad that does not have bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours.

6. Under Furniture Fabric

Place or secure under furniture fabric decking underneath item of furniture, or underneath upholstery cover and secure. Kills bed bugs that remain in contact with treated under furniture fabric for at least 24 hours.

7. Storage or Travel Bag

Items to be protected from bed bugs are placed in storage and travel bag. Kills bed bugs that remain in contact with treated storage or travel bag for at least 24 hours.

8. Fitted Under Mattress Pad

Fitted under mattress pad is attached to the underside of the mattress covering bottom and sides. It is secured by gathered elastic on all four corners. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated fitted under mattress pad for at least 24 hours.

{The following bullets are optional product claims}

- ◆ If this product Pro Tek 50 Fabric/Apparel (Garment) Treatment Treated fabric does not fit...Do not dry clean.
- ◆ Kills bed bugs that <live> <remain><stay> in contact with [treated]< this product><bed band><dust ruffle><headboard backing><box spring protector><under mattress pad><under furniture fabric/decking><storage or travel bag><fitted under mattress pad><for at least 24 hours.<Treated fabric><This product> <has no odor> <is odorless>. <Pro-Tek 50 Fabric/Apparel (Garment) Treatment><This product>is washable up to 20 times If <This product><Pro-Tek 50 Fabric/Apparel (Garment) Treatment ><Treated fabric> does not fit in standard washer wipe then clean with damp cloth or sponge or have it professionally washed. Do not dry clean.
- ◆ Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- ◆ "New" {for allowable time frame}
- ◆ Kills bed bugs that <live> <remain><stay> <hide> in contact with < Pro-Tek 50 Fabric/Apparel (Garment) Treatment ><reated> <bed band> <dust ruffle> <headboard backing> <box spring protector> <under mattress pad> <under furniture pad> <storage or travel bag> <fitted under mattress pad> for at least 24 hours.
- ◆ <Insecticidal> <killing> action remains effective for up to 20 washings.
- ◆ Kills bed bugs that stay in contact with Pro-Tek 50 Fabric/Apparel (Garment) Treatment under furniture fabric for at least 24 hours

{For box spring protector, under mattress pad, fitted under mattress pad, and dust ruffle only:}

- ◆ Kills bed bugs that stay in contact with fabric for at least 24 hours [between your box spring and mattress]–

{The following bullets are optional bed bug facts}

- ◆ Bed bugs come out to feed on human hosts
- ◆ Bed bugs typically feed at night
- ◆ Bed bugs may hide in your headboard and lay eggs
- ◆ Blood taken from humans is the food of bed bugs
- ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ◆ Bed bug colonies may cause offensive odors
- ◆ Female bed bugs can lay over 200 eggs in their lifetime
- ◆ Newly hatched bed bugs begin feeding immediately
- ◆ Bed bugs have a piercing beak

This product alone is not intended as a complete solution to bed bug infestations, but for use **with other products and methods for killing or preventing them. A partial list of such products and methods is given below.**

- **check second hand furniture and bedding for bed bugs before bringing them home**
- **when travelling, keep luggage up on luggage racks, check hotel beds and head boards for bed bugs**
- **upon return from travel, unpack and place clothes directly into washer, then dryer**
- **reduce clutter at home**
- **heat smaller infested articles to 113° for 1 hour**

Brackets Legend: { } Notes to reviewer. [] Optional language. < > Alternate words.

Page 2

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- freeze smaller articles at 0°F for 4 days
 - place interceptor traps under bed legs
 - encasements around mattresses and box springs
 - wash and dry bedding items (but not Pro-Tek products)
 - insecticidal sprays labeled for killing bed bugs

{Insert into package of Apparel/Fabric or hang-tag. Note: May be removed by consumer after purchase.}

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

This <fabric><apparel><garment> has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

{Following claims are for treated fabric, apparel or garments}

<Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.>

<Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.>

{Following two claims are for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers and other non-washable items}

<Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.>

<Repels mosquitoes for 6 months of outdoor exposure to the elements.>

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item in each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat <fabric><apparel><garment> with other permethrin insect repellent products. [For repellency protection of exposed skin, use with insect repellent approved for topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

{Bed Bug Products Only}

Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours.
Insecticidal (killing) action remains effective for up to 20 washings, if item fits in washer.
If item does not fit in washer, [DO NOT WASH, instead wipe clean with a damp cloth or sponge]

{FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS}***{For Bed Band}***

<Stretch><Position> Bed Band around <sides><edges> of mattress and secure tightly using [the Velcro® or other] closures provided. Band wraps around all four sides of the mattress. Bed band should be placed around <sides><edges> of mattress before bed is made and sheet is placed on mattress. Sheet should cover bed band so that band does not contact person lying on bed.

{For Bedskirt or Dust Ruffle}

Remove mattress. Place [fabric] over top of box spring or foundation so that it entirely covers it, with the <skirt><dust ruffle> draping around all four sides. Replace the mattress on top of the covered box spring or foundation. [The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.]

{For Headboard Backing}

Remove headboard and place on floor, <front side><face> down. Attach [treated] backing to back of headboard by tacking, stapling or with glue. With treated backing towards wall, reattach headboard to bed or hang on wall at head of bed as appropriate.

{For Box Spring Protector}

Place box spring inside <pouch> <cover> so that it is completely enclosed in the treated fabric, then <zip the <pouch> <cover> closed.>< secure bottom edge of <pouch><cover> with stitched gathered elastic.>

{For Under Mattress Pad}

Remove mattress. Place pad on box spring and secure with straps. Replace mattress over box springs. If bed does not have box springs, lay pad directly on foundation, without use of straps provided. Replace mattress on box spring or foundation.

{For Under Furniture Fabric}

Place or secure under furniture fabric under furniture or underneath upholstery cover.

{For Storage or Travel Bag}

Place items to be protected from bed bugs directly in <permethrin treated storage>
[or]<permethrin treated travel bag>.

{For Fitted Under Mattress Pad}

Fitted under mattress pad is attached to underside of mattress, covering bottom and sides. Use elastic gathered corners to secure pad to mattress. Place mattress cloth side down on the box spring or bed platform.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

<RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS
<APPAREL> <FABRIC><PRODUCT>.>

<THIS INSERT IS][NOT TO BE REMOVED EXCEPT BY CONSUMER.>]

{Label (small tag) sewn into washable fabric}

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

{For bed bug products}

Kills Bed Bugs that stay in contact
for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings.

{For fabric/apparel/garments}

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges

Repellency remains effective
through 25 washings

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

***This product alone is not intended
as a complete solution to bed bug infestations,
but for use with other products and
methods, such as those listed on the main label.***

- **Label for Dog Bandanas**

PRO-TEK 50 Fabric/Apparel (Garment) Treatment**DOG BANDANA****DO NOT USE ON CATS**

This bandana is for use on dogs **ONLY** and has been treated with **PRO-TEK 50** Fabric/Apparel (Garment) Treatment that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana <covers>< is affixed to> the dog. To protect your dog, a product that provides complete body <protection><coverage> must be used.

Repellency remains effective for 25 washings or 6 months if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:

Permethrin 0.52%

Other Ingredients: 99.48%

Total 100.00%

Manufactured by:

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

DIRECTIONS FOR USE {for Pro-Tek 50 Fabric/Apparel (Garment) Treatment dog bandana}

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Wrap bandana around dog's neck making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana <covers><is affixed to> the dog. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat this bandana with other permethrin insect repellent products.

Wash this bandana separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. [THIS INSERT IS] NOT TO BE REMOVED EXCEPT BY CONSUMER.]

{tag sewn on bandana}

**PRO-TEK 50 Fabric/Apparel
(Garment) Treatment**

Dog Bandana

DO NOT USE ON CATS

Do Not Dry Clean

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges.

Repellency remains effective through 25 washings; or
for six months if left unwashed.

----- (fold line) -----

Active Ingredient:

Pennethrin 0.52 %

PA Reg. No. 83122-1

EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to full label for more
information.

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

EPA Reg. No. 83122-1

{Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS). The following statements are product descriptors describing each sub-label and are not required language for product labels.}

EIGHT TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS**1. Bed Band**

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band available in appropriate width for mattress thickness). Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated flat, bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Treated two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip pouch closed, or secure bottom edge of protector with stitched gathered elastic. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. If no box spring, use under mattress pad that does not have bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours.

6. Under Furniture Fabric

Place or secure under furniture fabric decking underneath item of furniture, or underneath upholstery cover and secure. Kills bed bugs that remain in contact with treated under furniture fabric for at least 24 hours.

7. Storage or Travel Bag

Items to be protected from bed bugs are placed in storage and travel bag. Kills bed bugs that remain in contact with treated storage or travel bag for at least 24 hours.

8. Fitted Under Mattress Pad

Fitted under mattress pad is attached to the underside of the mattress covering bottom and sides. It is secured by gathered elastic on all four corners. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated fitted under mattress pad for at least 24 hours.

{The following bullets are optional product claims}

- ◆ If this product Pro Tek 50 Fabric/Apparel (Garment) Treatment Treated fabric does not fit... Do not dry clean.
- ◆ Kills bed bugs that <live> <remain><stay> in contact with [treated]< this product><bed band><dust ruffle><headboard backing><box spring protector><under mattress pad><under furniture fabric/decking><storage or travel bag><fitted under mattress pad><bandana> for at least 24 hours.<Treated fabric><This product> <has no odor> <is odorless>. <Pro-Tek 50 Fabric/Apparel (Garment) Treatment><This product>is washable up to 20 times If <This product><Pro-Tek 50 Fabric/Apparel (Garment) Treatment><Treated fabric> does not fit in standard washer wipe then clean with damp cloth or sponge or have it professionally washed. Do not dry clean.
- ◆ Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- ◆ "New" {for allowable time frame}
- ◆ Kills bed bugs that <live> <remain><stay> <hide> in contact with < Pro-Tek 50 Fabric/Apparel (Garment) Treatment ><treated> <bed band> <dust ruffle> <headboard backing> <box spring protector> <under mattress pad> <under furniture pad> <storage or travel bag> <fitted under mattress pad> for at least 24 hours.
- ◆ <Insecticidal> <killing> action remains effective for up to 20 washings.
- ◆ Kills bed bugs that stay in contact with Pro-Tek 50 Fabric/Apparel (Garment) Treatment under furniture fabric for at least 24 hours

(For box spring protector, under mattress pad, fitted under mattress pad, and dust ruffle only:)

- ◆ Kills bed bugs that stay in contact with fabric for at least 24 hours] between your box spring and mattress]-

{The following bullets are optional bed bug facts}

- ◆ Bed bugs come out to feed on human hosts
- ◆ Bed bugs typically feed at night
- ◆ Bed bugs may hide in your headboard and lay eggs
- ◆ Blood taken from humans is the food of bed bugs
- ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ◆ Bed bug colonies may cause offensive odors
- ◆ Female bed bugs can lay over 200 eggs in their lifetime
- ◆ Newly hatched bed bugs begin feeding immediately
- ◆ Bed bugs have a piercing beak

This product alone is not intended as a complete solution to bed bug infestations, but for use with other products and methods for killing or preventing them. A partial list of such products and methods is given below.

- check second hand furniture and bedding for bed bugs before bringing them home
- when travelling, keep luggage up on luggage racks, check hotel beds and head boards for bed bugs
- upon return from travel, unpack and place clothes directly into washer, then dryer

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- reduce clutter at home
- heat smaller infested articles to 113° for 1 hour
- freeze smaller articles at 0° F for 4 days
- place interceptor traps under bed legs
- encasements around mattresses and box springs
- wash and dry bedding items (but not Pro-Tek products)
- insecticidal sprays labeled for killing bed bugs

{Insert into package of Apparel/Fabric or hang-tag. Note: May be removed by consumer after purchase.}

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

This <fabric><apparel><garment> has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

{Following claims are for treated fabric, apparel or garments}

<Repels Mosquitoes, Ticks, Flies, Chiggers, and Midgees. Repellency remains effective through 25 washings.>

<Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.>

{Following two claims are for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers and other non-washable items}

<Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.>

<Repels mosquitoes for 6 months of outdoor exposure to the elements.>

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients:

99.48 %

Total

100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Content(s): one item in each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat <fabric><apparel><garment> with other permethrin insect repellent products. [For repellency protection of exposed skin, use with insect repellent approved for topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

{Bed Bug Products Only}

Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours. Insecticidal (killing) action remains effective for up to 20 washings, if item fits in washer. If item does not fit in washer, [DO NOT WASH, instead wipe clean with a damp cloth or sponge]

{DIRECTION FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS}***{For Bed Band}***

<Stretch><Position> Bed Band around <sides><edges> of mattress and secure tightly using [the Velcro® or other] closures provided. Band wraps around all four sides of the mattress. Bed band should be placed around <sides><edges> of mattress before bed is made and sheet is placed on mattress. Sheet should cover bed band so that band does not contact person lying on bed.

{For Bedskirt or Dust Ruffle}

Remove mattress. Place [fabric] over top of box spring or foundation so that it entirely covers it, with the <skirt><dust ruffle> draping around all four sides. Replace the mattress on top of the covered box spring or foundation. [The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.]

{For Headboard Backing}

Remove headboard and place on floor, <front side><face> down. Attach [treated] backing to back of headboard by tacking, stapling or with glue. With treated backing towards wall, reattach headboard to bed or hang on wall at head of bed as appropriate.

{For Box Spring Protector}

Place box spring inside <pouch> <cover> so that it is completely enclosed in the treated fabric, then <zip the <pouch> <cover> closed.>< secure bottom edge of <pouch><cover> with stitched gathered elastic.>

{For Under Mattress Pad}

Remove mattress. Place pad on box spring and secure with straps. Replace mattress over box springs. If bed does not have box springs, lay pad directly on foundation, without use of straps provided. Replace mattress on box spring or foundation.

{For Under Furniture Fabric}

Place or secure under furniture fabric under furniture or underneath upholstery cover.

{For Storage or Travel Bag}

Place items to be protected from bed bugs directly in <permethrin treated storage>
[or]<permethrin treated travel bag>.

{For Fitted Under Mattress Pad}

Fitted under mattress pad is attached to underside of mattress, covering bottom and sides. Use elastic gathered corners to secure pad to mattress. Place mattress cloth side down on the box spring or bed platform.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

<RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS
<APPAREL> <FABRIC><PRODUCT>.>

<THIS INSERT IS[[NOT TO BE REMOVED EXCEPT BY CONSUMER.>[

{Label (small tag) sewn into washable fabric}

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

{For bed bug products}

Kills Bed Bugs that stay in contact
for at least 24 hours.

Insecticidal activity remains

Effective up to 20 washings.

Use in Integrated Pest Management program

{For fabric/apparel/garments}

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges

Repellency remains effective
through 25 washings

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1

EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

**This product alone is not intended
as a complete solution to bed bug infestations,
but for use with other products and
methods, as listed such as those listed on the main label.**

• **Label for Dog Bandanas**

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

DOG BANDANA

DO NOT USE ON CATS

This bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50 Fabric/Apparel (Garment)** Treatment that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana <covers>< is affixed to> the dog. To protect your dog, a product that provides complete body <protection><coverage> must be used.

Repellency remains effective for 25 washings or 6 months if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:

Permethrin	0.52%
Other Ingredients:	<u>99.48%</u>
Total	100.00%

Manufactured by:

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

DIRECTIONS FOR USE {for Pro-Tek 50 Fabric/Apparel (Garment) Treatment dog bandana}

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Wrap bandana around dog's neck making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana <covers><is affixed to> the dog. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat this bandana with other permethrin insect repellent products.

Wash this bandana separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. [THIS INSERT IS] NOT TO BE REMOVED EXCEPT BY CONSUMER.]

{tag sewn on bandana}

**PRO-TEK 50 Fabric/Apparel
(Garment) Treatment**

Dog Bandana

DO NOT USE ON CATS

Do Not Dry Clean

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges.

Repellency remains effective through 25 washings; or
for six months if left unwashed.

----- (fold line) -----

Active Ingredient:

Pennethrin 0.52 %

PA Reg. No. 83122-1

EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to full label for more
information.

Please reply to:

ICR, Inc.

1330 Dillon Heights Avenue

Baltimore, MD 21228

February 21, 2012

Richard J. Gebken PM 10

Insecticide Branch, Registration Division

Document Processing Desk (7504C)

Office of Pesticide Programs

U. S. ENVIRONMENTAL PROTECTION AGENCY

Room S-4900, One Potomac Yard

2777 South Crystal Drive

Arlington, VA 22202

Attention: Ms. Linda DeLuise

SUBJECT: PRO-TEK 50 Fabric/Apparel (Garment) Treatment

EPA Reg. No. 83122-1

Label revisions required for reregistration (PDCL)

Dear Mr. Gebken:

Thank your February 7, 2012 letter and July 13, 2011 label review. Please find attached the label for PRO-TEK 50 Fabric/Apparel (Garment) Treatment ('Pro-Tek') revised as requested. Specifically we have added 'DO NOT USE ON CATS' on the front panels of the two dog bandana parts the label and have enclosed the storage and disposal statements in boxes.

We have also included the revisions requested in your August 3, 2011 letter (attached). However we are unsure of the first comment: 'On page 2 start a bullet "If this product Pro Tek 50 Fabrics/Apparel (Garment) Treatment treated fabric does not fit Do no dry clean." We have inserted this statement, but are unsure of the additional text implied by "...." ' and would appreciate your enlightening us.

We also attach the label in track-change mode to make it easier to find the revisions.

If you have any questions, please do not hesitate to contact me (RTodd@icrlab.com) or Ellen Quinn (EQuinn@icrlab.com) and we can both be reached at 410-747-4500.

Yours sincerely,

Robin G. Todd PhD. BCE.
Technical Consultant & Agent for Garnik Industries, LLC
Encl.

cc: G. Innocenti w/encl
J. Erdheim w/encl

Date: December 12, 2011

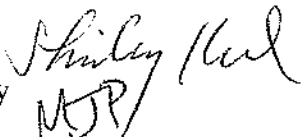
Reg. No.: 83122-1

Product Name: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

PM Name/Number: Mark Suarez, Risk Management Team 13

Primary Reviewer: Shirley Keel

Secondary Reviewer: Mark Perry



New label or date of RD amended label: Received on 6/17/11

Active Ingredient(s) Assessed: Permethrin/109701

Formulation Type: Impregnated Materials

Other ai's in product

Name/PC code: N/A

Reregistration Status or Registration Date: N/A

Assessment can be found N:\RMIBV\label\083122/1

-
- 1) Include the following statement prominently on the front panel of product label for Dog Bandanas, "DO NOT USE ON CATS."
 - 2) Place the Storage and Disposal statements in a textbox for prominence.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 26, 2011

MEMORANDUM:

Subject: EPA Reg. No.: 83122-1/ Pro-Tek 50 Fabric/Apparel (Garment) Treatment
DP Barcode: 391348
Case No.: 2510

From: Jolene Trujillo, Biologist *Jolene E Trujillo*
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

To: Bonnie Adler, CRM
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Applicant: Garnik Industries, LLC
219 Scott Street, #182
Beaufort, SC 29902-5554

FORMULATION FROM EPA Reg. No. 83122-1 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Permethrin	0.52%
<u>Other Ingredient(s):</u>	99.48%
Total	100.00%

BACKGROUND: In the 8 month response to the Permethrin RED, the registrant has submitted acute toxicity studies and waiver requests to support the reregistration of their product, EPA Reg. No. 83122-1. The MRID's are as follows: 481391-01 (81-1), 481391-02 (81-2), 481391-03 (81-5), 481391-04 (81-6). The studies were conducted by Eurofins PSL. The test material used in each of the studies was the subject product.

RMIBV/PRD finds the waiver requests acceptable for acute inhalation (81-3) and primary eye irritation (81-4). Based on data presented available to the Agency, information presented in the waiver requests and how the product is used, toxicity category IV is deemed appropriate.

RECOMMENDATIONS:

- The acute toxicity studies submitted are acceptable to support the reregistration of EPA Reg. No. 83122-1.

The acute toxicity profile for EPA Reg. No. 83122-1 is currently:

Acute Oral	IV	Acceptable (LD ₅₀ >5000 mg/kg)
Acute Dermal	IV	Acceptable (LD ₅₀ >5000 mg/kg)
Acute Inhalation	IV	Waived
Primary Eye	IV	Waived
Primary Dermal	IV	Acceptable
Skin Sensitization	non sensitizer	Acceptable

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 83122-1/ Pro-Tek 50 Fabric/Apparel (Garment) Treatment

SIGNAL WORD: CAUTION*

FIRST AID*:

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove

contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

* Since product is a category four (4) for all routes and a non sensitizer, signal word and first aid statements are not required. However, if the registrant chooses to include those, they should appear as above.

DATA REVIEW FOR ACUTE ORAL TOXICITY (§81-1, 870.1100)

Product Manager: Richard Gebken, PM 10
MRID No.: 481391-01

Reviewer: Jolene Trujillo
Study Completion Date: 05/19/10
Report No.: 28971

Testing Facility: Eurofins PSL
Author: Jennifer Durando, B.S

Quality Assurance (40 CFR §160.12): Included

Test Material: PRO-TEK 50 Fabric/Apparel Garment Treatment

Species: Sprague-Dawley derived albino rat

Conclusion: Up & Down Method

1. **LD₅₀ (mg/kg):** > 5000 mg/kg

2. **Toxicity Category:** IV

Classification: Acceptable

Procedure (Deviations from §81-1): none

Results:

Main Study

(U&D)

Test Sequence	Animal Id	Dose Level (mg/kg)	Short term outcome	Long term outcome
1	3101	5000	S	S
2	3102	5000	S	S
3	3103	5000	S	S

S = survival; D = death

DATA REVIEW FOR ACUTE DERMAL TOXICITY (§81-2, 870.1100)

Product Manager: Richard Gebken, PM 10
MRID No.: 481391-02

Reviewer: Jolene Trujillo
Study Completion Date: 05/19/10
Report No.: 28972

Testing Facility: Eurofins PSL
Author: Jennifer Durando, B.S

Quality Assurance (40 CFR §160.12): Included

Test Material: PRO-TEK 50 Fabric/Apparel Garment Treatment
Species: Sprague-Dawley derived albino rat

Summary:

1. **LD₅₀ (mg/kg):** > 5000 mg/kg

2. **Toxicity Category:** IV **Classification:** Acceptable

Procedure (Deviations From §81-2): none

Results: Reported Mortality

Dosage (mg/kg)	(number deaths/number tested)		
	Males	Females	Combined
5000	0/5	0/5	0/10

DATA REVIEW FOR SKIN IRRITATION TESTING (§81-5, 870.2500)

Product Manager: Richard Gebken, PM 10
MRID No.: 481391-03

Reviewer: Jolene Trujillo
Study Completion Date: 05/19/10
Report No.: 28974

Testing Facility: Eurofins PSL
Author: Jennifer Durando, B.S

Quality Assurance (40 CFR §160.12): Included

Test Material: PRO-TEK 50 Fabric /Apparel Garment Treatment

Dosage: Sample cut into 1"x1" piece and then moistened with 0.1 mL of distilled water prior to application. 0.5 g of the of the test substance was applied to one 6-cm² intact dose site

Species: New Zealand albino rabbit

Summary:

- 1. Toxicity Category:** IV PII =0
- 2. Classification:** Acceptable

Procedure (Deviations From §81-5): none

Results:

ERYTHEMA/EDEMA

Animal No.	Sex	Time After Patch Removal			
		30-60 min	24 hrs	48 hrs	72 hrs
3501	F	0/0	0/0	0/0	0/0
3502	F	0/0	0/0	0/0	0/0
3503	F	0/0	0/0	0/0	0/0

DATA REVIEW FOR DERMAL SENSITIZATION TESTING (§81-6, 870.2600)

Product Manager: Richard Gebken, PM 10

MRID No.: 481391-04

Reviewer: Jolene Trujillo

Study Completion Date: 05/19/10

Report No.: 28975

Testing Facility: Eurofins PSL

Author: Jennifer Durando, B.S

Quality Assurance (40 CFR §160.12): Included

Test Material: PRO-TEK 50 Fabric/Apparel Garment Treatment

Positive Control Material: HCA historical control (PSL # 28478, 12/30/09)

Species: Hartley albino guinea pig

Method: Buehler

Summary:

1. This Product is a non sensitizer
2. Classification: Acceptable

Procedure (Deviation From §81-6): none

Results:

Twenty four hours after the first induction dose for the test material-induced animals, 20/20 exhibited no reaction. After the second induction dose, 1/20 exhibited very faint erythema. After the third induction dose, 20/20 exhibited no reaction at the test site.

Twenty four hours after challenge, 20/20 test material-induced animals exhibited no reaction. At 24 hours, in the naive control group of animals challenged with the test material, 10/10 exhibited no reaction.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

July 26, 2011

MEMORANDUM:

Subject: EPA Reg. No.: 83122-1/ Pro-Tek 50 Fabric/Apparel (Garment) Treatment
DP Barcode: 391348
Case No.: 2510

From: Jolene Trujillo, Biologist *Jolene E Trujillo*
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

To: Bonnie Adler, CRM
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Applicant: Garnik Industries, LLC
219 Scott Street, #182
Beaufort, SC 29902-5554

FORMULATION FROM EPA Reg. No. 83122-1 LABEL:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Permethrin	0.52%
<u>Other Ingredient(s):</u>	99.48%
Total	100.00%

BACKGROUND: In the 8 month response to the Permethrin RED, the registrant has submitted acute toxicity studies and waiver requests to support the reregistration of their product, EPA Reg. No. 83122-1. The MRID's are as follows: 481391-01 (81-1), 481391-02 (81-2), 481391-03 (81-5), 481391-04 (81-6). The studies were conducted by Eurofins PSL. The test material used in each of the studies was the subject product.

RMIBV/PRD finds the waiver requests acceptable for acute inhalation (81-3) and primary eye irritation (81-4). Based on data presented available to the Agency, information presented in the waiver requests and how the product is used, toxicity category IV is deemed appropriate.

RECOMMENDATIONS:

- The acute toxicity studies submitted are acceptable to support the reregistration of EPA Reg. No. 83122-1.

The acute toxicity profile for EPA Reg. No. 83122-1 is currently:

Acute Oral	IV	Acceptable (LD ₅₀ >5000 mg/kg)
Acute Dermal	IV	Acceptable (LD ₅₀ >5000 mg/kg)
Acute Inhalation	IV	Waived
Primary Eye	IV	Waived
Primary Dermal	IV	Acceptable
Skin Sensitization	non sensitizer	Acceptable

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: 83122-1/ Pro-Tek 50 Fabric/Apparel (Garment) Treatment

SIGNAL WORD: CAUTION*

FIRST AID*:

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove

contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

* Since product is a category four (4) for all routes and a non sensitizer, signal word and first aid statements are not required. However, if the registrant chooses to include those, they should appear as above.

DATA REVIEW FOR ACUTE ORAL TOXICITY (§81-1, 870.1100)

Product Manager: Richard Gebken, PM 10

MRID No.: 481391-01

Reviewer: Jolene Trujillo

Study Completion Date: 05/19/10

Report No.: 28971

Testing Facility: Eurofins PSL

Author: Jennifer Durando, B.S

Quality Assurance (40 CFR §160.12): Included

Test Material: PRO-TEK 50 Fabric/Apparel Garment Treatment

Species: Sprague-Dawley derived albino rat

Conclusion: Up & Down Method

1. **LD₅₀ (mg/kg):** > 5000 mg/kg

2. **Toxicity Category:** IV

Classification: Acceptable

Procedure (Deviations from §81-1): none

Results:

Main Study

(U&D)

Test Sequence	Animal Id	Dose Level (mg/kg)	Short term outcome	Long term outcome
1	3101	5000	S	S
2	3102	5000	S	S
3	3103	5000	S	S

S = survival; D = death

DATA REVIEW FOR ACUTE DERMAL TOXICITY (§81-2, 870.1100)

Product Manager: Richard Gebken, PM 10

MRID No.: 481391-02

Reviewer: Jolene Trujillo

Study Completion Date: 05/19/10

Report No.: 28972

Testing Facility: Eurofins PSL

Author: Jennifer Durando, B.S

Quality Assurance (40 CFR §160.12): Included

Test Material: PRO-TEK 50 Fabric/Apparel Garment Treatment

Species: Sprague-Dawley derived albino rat

Summary:

1. **LD₅₀ (mg/kg):** > 5000 mg/kg

2. **Toxicity Category:** IV

Classification: Acceptable

Procedure (Deviations From §81-2): none

Results:

Reported Mortality

Dosage (mg/kg)	(number deaths/number tested)		
	Males	Females	Combined
5000	0/5	0/5	0/10

DATA REVIEW FOR SKIN IRRITATION TESTING (§81-5, 870.2500)

Product Manager: Richard Gebken, PM 10
MRID No.: 481391-03

Reviewer: Jolene Trujillo
Study Completion Date: 05/19/10
Report No.: 28974

Testing Facility: Eurofins PSL
Author: Jennifer Durando, B.S

Quality Assurance (40 CFR §160.12): Included

Test Material: PRO-TEK 50 Fabric /Apparel Garment Treatment

Dosage: Sample cut into 1"x1" piece and then moistened with 0.1 mL of distilled water prior to application. 0.5 g of the of the test substance was applied to one 6-cm² intact dose site

Species: New Zealand albino rabbit

Summary:

1. **Toxicity Category:** IV **PII =0**
2. **Classification:** Acceptable

Procedure (Deviations From §81-5): none

Results:

ERYTHEMA/EDEMA

Animal No.	Sex	Time After Patch Removal			
		30-60 min	24 hrs	48 hrs	72 hrs
3501	F	0/0	0/0	0/0	0/0
3502	F	0/0	0/0	0/0	0/0
3503	F	0/0	0/0	0/0	0/0

DATA REVIEW FOR DERMAL SENSITIZATION TESTING (§81-6, 870.2600)

Product Manager: Richard Gebken, PM 10

MRID No.: 481391-04

Reviewer: Jolene Trujillo

Study Completion Date: 05/19/10

Report No.: 28975

Testing Facility: Eurofins PSL

Author: Jennifer Durando, B.S

Quality Assurance (40 CFR §160.12): Included

Test Material: PRO-TEK 50 Fabric/Apparel Garment Treatment

Positive Control Material: HCA historical control (PSL # 28478, 12/30/09)

Species: Hartley albino guinea pig

Method: Buehler

Summary:

1. This Product is a non sensitizer

2. Classification: Acceptable

Procedure (Deviation From §81-6): none

Results:

Twenty four hours after the first induction dose for the test material-induced animals, 20/20 exhibited no reaction. After the second induction dose, 1/20 exhibited very faint erythema. After the third induction dose, 20/20 exhibited no reaction at the test site.

Twenty four hours after challenge, 20/20 test material-induced animals exhibited no reaction. At 24 hours, in the naive control group of animals challenged with the test material, 10/10 exhibited no reaction.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 7, 2012

SENT BY E-MAIL

Mr. Robin Todd, Ph.D.
Agent for Garnik Industries, LLC
1330 Dillion Height Avenue
Baltimore, MD 21228-1199

Subject: Request for Updated Reregistration Label for EPA Reg. No. 83122-1
Product Name: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Dear Dr. Todd:

The Agency has completed a preliminary review of the label that your company submitted in support of the reregistration of EPA Reg. No. 83122-1, **Pro-Tek 50 Fabric/Apparel (Garment) Treatment**, and has determined that the referenced label did not effectively incorporate all mandatory mitigation language required by the RED(s) for products containing permethrin. Please refer to the attached preliminary label review for assistance in updating this label.

Within 10 working days of the date of this letter, you must submit an updated label incorporating all mandatory mitigation language required by the RED(s) for permethrin. If we do not receive an amended label in response to this letter, the Agency may pursue further regulatory action, including cancellation under section 6 of FIFRA.

If you have any questions about this letter, please contact Linda A. DeLuise at (703) 305-5428 or via e-mail at deluise.linda@epa.gov or Mr. Richard J. Gebken at (703) 305-6701 or via e-mail at Gebken.Richard@epa.gov. When submitting the amended label in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely yours,

Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure: Copy of review dated December 12, 2011
Copy of product chemistry review dated July 13, 2011
Copy of toxicology review dated July 26, 2011
83122-1 D413202

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours
Insecticidal (killing) action remains effective for up to 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item each package

- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] [under mattress pad] [under furniture pad] for at least 24 hours
- Bed bugs come out to feed on human hosts
- Bed bugs typically feed at night
- Bed bugs may hide in your headboard and lay eggs
- Blood taken from humans is the food of bed bugs
- Bed bug bites may cause welts which become irritated, inflamed and itchy
- Bed bug colonies may cause offensive odors
- Female bed bugs can lay over 200 eggs in their lifetime
- Newly hatched bed bugs begin feeding immediately
- Bed bugs have a piercing beak
- Treated fabric has no odor and is washable up to 20 times
- Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- "New" (for allowable time frame)
- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] for at least 24 hours.
- Insecticidal (killing) action remains effective for up to 20 washings.
- Kills bed bugs that stay in contact with fabric for at least 24 hours between your box spring and mattress, or under mattress if no box spring - (for box spring protector, under mattress pad and dust ruffle only)
- Kills bed bugs that stay in contact with under furniture pad for at least 24 hours.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

1. Bed Band

Stretch bed band around edges of mattress and secured tightly using the Velcro or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact to persons lying on the bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.]

4. Box Spring Protector

Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

5. Under Mattress Pad

Place pad between mattress and box spring and secure with straps. If no box spring lay strapless under mattress pad on surface directly beneath mattress.

6. Under Furniture Pad

Place pad under furniture and secure as directed.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs that
stay in contact for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

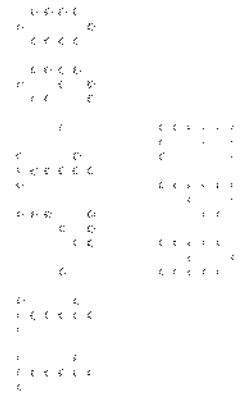
Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.



NEW

Label for Dog Bandanas

Master Label Pro-Tek 50 Fabric (including Dog Bandana)

PRO-TEK 50 DOG BANDANA

The Pro-Tek 50 Bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50** that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana covers [is affixed to] the dog [pet]. To protect your dog, a product that provides complete body protection must be used.

Repellency remains effective for 25 washings.

Repellency to mosquitoes remains effective for 6 months of exposure to weathering if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:

Permethrin

0.52 %

Other Ingredients:

99.48 %

Total

100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

0.52 %
99.48 %
100.00 %

DIRECTIONS FOR USE

Wrap bandana around dog's neck, making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana covers [is affixed to] the dog [pet]. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat Pro-Tek 50 Dog Bandanas with other permethrin insect repellent products.

Wash ProTek 50 Dog Bandanas separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. NOT TO BE REMOVED EXCEPT BY CONSUMER.]

[illegible]

NEW

Master Label: Pro-Tek 50 Dog Bandana

Hang tag sewn on bandana:

PRO-TEK 50 Dog Bandana

Do Not Dry Clean

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings; or
for six months if left unwashed]

----- (fold line) -----

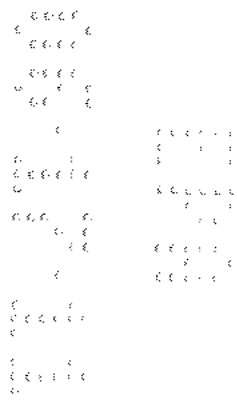
Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to label for more
information.



Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

SIX TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON & AROUND BEDS

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours. If no box spring, use under mattress pad that does not have bands.

6. Under Furniture Pad

Place under furniture pad underneath item of furniture and secure. Kills bed bugs that remain in contact with treated under furniture pad for at least 24 hours.

ACCEPTED

JUN - 1 2010

Under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under EPA Reg. No. 83122-1



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

February 7, 2012

SENT BY E-MAIL

Mr. Robin Todd, Ph.D.
Agent for Garnik Industries, LLC
1330 Dillion Height Avenue
Baltimore, MD 21228-1199

Subject: Request for Updated Reregistration Label for EPA Reg. No. 83122-1
Product Name: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Dear Dr. Todd:

The Agency has completed a preliminary review of the label that your company submitted in support of the reregistration of EPA Reg. No. 83122-1, **Pro-Tek 50 Fabric/Apparel (Garment) Treatment**, and has determined that the referenced label did not effectively incorporate all mandatory mitigation language required by the RED(s) for products containing permethrin. Please refer to the attached preliminary label review for assistance in updating this label.

Within 10 working days of the date of this letter, you must submit an updated label incorporating all mandatory mitigation language required by the RED(s) for permethrin. If we do not receive an amended label in response to this letter, the Agency may pursue further regulatory action, including cancellation under section 6 of FIFRA.

If you have any questions about this letter, please contact Linda A. DeLuise at (703) 305-5428 or via e-mail at deluise.linda@epa.gov or Mr. Richard J. Gebken at (703) 305-6701 or via e-mail at Gebken.Richard@epa.gov. When submitting the amended label in response to this letter, a copy of this letter should accompany the submission to facilitate processing.

Sincerely yours,

Richard J. Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure: Copy of review dated December 12, 2011
Copy of product chemistry review dated July 13, 2011
Copy of toxicology review dated July 26, 2011

83122-1 D413202

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

Please reply to:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228

February 21, 2012

Richard J. Gebken PM 10
Insecticide Branch, Registration Division
Document Processing Desk (7504C)
Office of Pesticide Programs
U. S. ENVIRONMENTAL PROTECTION AGENCY
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Attention: Ms. Linda DeLuise

SUBJECT: PRO-TEK 50 Fabric/Apparel (Garment) Treatment
EPA Reg. No. 83122-1
Label revisions required for reregistration (PDCL)

Dear Mr. Gebken:

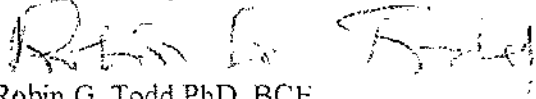
Thank your February 7, 2012 letter and July 13, 2011 label review. Please find attached the label for PRO-TEK 50 Fabric/Apparel (Garment) Treatment ('Pro-Tek') revised as requested. Specifically we have added 'DO NOT USE ON CATS' on the front panels of the two dog bandana parts the label and have enclosed the storage and disposal statements in boxes.

We have also included the revisions requested in your August 3, 2011 letter (attached). However we are unsure of the first comment: 'On page 2 start a bullet "If this product Pro Tek 50 Fabrics/Apparel (Garment) Treatment treated fabric does not fit Do no dry clean.'" We have inserted this statement, but are unsure of the additional text implied by "...." and would appreciate your enlightening us.

We also attach the label in track-change mode to make it easier to find the revisions.

If you have any questions, please do not hesitate to contact me (RTodd@icr-lab.com) or Ellen Quinn (EQuinn@icr-lab.com) and we can both be reached at 410-747-4500.

Yours sincerely.

A handwritten signature in dark ink, appearing to read "Robin G. Todd". The signature is fluid and cursive, with the first name "Robin" being the most prominent.

Robin G. Todd PhD. BCE.

Technical Consultant & Agent for Garnik Industries, LLC

Encl.

cc: G. Innocenti w/encl

J. Erdheim w/encl

83122-1

8/3/2011

10/12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

AUG - 3 2011

Mr. Robin Todd, PhD
Agent for Garnick Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

Dear Dr. Todd:

Subject: Amendment- addition of IPM statement and two bed bugs products and California new language
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submissions dated April 27, May 12, and July 6, 2011

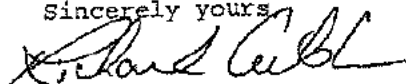
The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. On page 2 start a new bullet "If this product Pro Tek 50 Fabric/Apparel (Garment) Treatment Treated fabric does not fit...Do not dry clean."
2. On page 5 change "DIRECTIONS FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS" to "FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS".
3. On page 6 change "Place items to be protected from bed bugs directly in <storage> [or] <travel bag>." to "Place items to be protected from bed bugs directly in <permethrin treated storage> [or] <permethrin treated travel bag>."
4. On page 7 delete "Use in Integrated Pest Management Program".
5. On page 7 change "This product alone in not intended as a complete solution to bed bug infestations, but for use with other products and methods, as listed on the main label." to "This product alone in not intended as a complete solution to bed bug infestations, but for use with other products and methods, such as those listed on the main label."

A stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours



Richard Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure

83122-1

8/3/2011

10f12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

AUG - 3 2011

Mr. Robin Todd, PhD
Agent for Garnick Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

Dear Dr. Todd:

Subject: Amendment- addition of IPM statement and two bed bugs products and California new language
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submissions dated April 27, May 12, and July 6, 2011

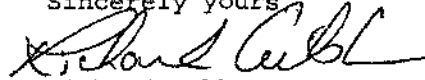
The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. On page 2 start a new bullet "If this product Pro Tek 50 Fabric/Apparel (Garment) Treatment Treated fabric does not fit...Do not dry clean."
2. On page 5 change "DIRECTIONS FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS" to "FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS".
3. On page 6 change "Place items to be protected from bed bugs directly in <storage> [or] <travel bag>." to "Place items to be protected from bed bugs directly in <permethrin treated storage> [or] <permethrin treated travel bag>."
4. On page 7 delete "Use in Integrated Pest Management Program".
5. On page 7 change "This product alone in not intended as a complete solution to bed bug infestations, but for use with other products and methods, as listed on the main label." to "This product alone in not intended as a complete solution to bed bug infestations, but for use with other products and methods, such as those listed on the main label."

A stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours



Richard Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure

30912

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

EPA Reg. No. 83122-1

{Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS). The following statements are product descriptors describing each sub-label and are not required language for product labels.}

EIGHT TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band available in appropriate width for mattress thickness). Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated flat, bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Treated two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip pouch closed, or secure bottom edge of protector with stitched gathered elastic. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. If no box spring, use under mattress pad that does not have bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours.

6. Under Furniture Fabric

Place or secure under furniture fabric decking underneath item of furniture, or underneath upholstery cover and secure. Kills bed bugs that remain in contact with treated under furniture fabric for at least 24 hours.

7. Storage or Travel Bag

Items to be protected from bed bugs are placed in storage and travel bag. Kills bed bugs that remain in contact with treated storage or travel bag for at least 24 hours.

8. Fitted Under Mattress Pad

Fitted under mattress pad is attached to the underside of the mattress covering bottom and sides. It is secured by gathered elastic on all four corners. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated fitted under mattress pad for at least 24 hours.

ACCEPTED
COMMENTS
EPA Letter Dated

AUG - 3 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 83122-1

{The following bullets are optional product claims}

- ◆ Kills bed bugs that <live> <remain> <stay> in contact with {treated}< this product> <bed band> <dust ruffle> <headboard backing> <box spring protector> <under mattress pad> <under furniture fabric/decking> <storage or travel bag> <fitted under mattress pad> <bandana> for at least 24 hours. <Treated fabric> <This product> <has no odor> <is odorless>. <Pro-Tek 50 Fabric/Apparel (Garment) Treatment> <This product> is washable up to 20 times. If <This product> <Pro-Tek 50 Fabric/Apparel (Garment) Treatment> <Treated fabric> does not fit in standard washer wipe then clean with damp cloth or sponge or have it professionally washed. Do not dry clean.
- ◆ Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- ◆ "New" {for allowable time frame}
- ◆ Kills bed bugs that <live> <remain> <stay> <hide> in contact with < Pro-Tek 50 Fabric/Apparel (Garment) Treatment> <treated> <bed band> <dust ruffle> <headboard backing> <box spring protector> <under mattress pad> <under furniture pad> <storage or travel bag> <fitted under mattress pad> for at least 24 hours.
- ◆ <Insecticidal> <killing> action remains effective for up to 20 washings.
- ◆ Kills bed bugs that stay in contact with Pro-Tek 50 Fabric/Apparel (Garment) Treatment under furniture fabric for at least 24 hours

{For box spring protector, under mattress pad, fitted under mattress pad, and dust ruffle only:}

- ◆ Kills bed bugs that stay in contact with fabric for at least 24 hours [between your box spring and mattress]—

{The following bullets are optional bed bug facts}

- ◆ Bed bugs come out to feed on human hosts
- ◆ Bed bugs typically feed at night
- ◆ Bed bugs may hide in your headboard and lay eggs
- ◆ Blood taken from humans is the food of bed bugs
- ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ◆ Bed bug colonies may cause offensive odors
- ◆ Female bed bugs can lay over 200 eggs in their lifetime
- ◆ Newly hatched bed bugs begin feeding immediately
- ◆ Bed bugs have a piercing beak

This product alone is not intended as a complete solution to bed bug infestations, but for use with other products and methods for killing or preventing them. A partial list of such products and methods is given below.

- check second hand furniture and bedding for bed bugs before bringing them home
- when travelling, keep luggage up on luggage racks, check hotel beds and head boards for bed bugs

- upon return from travel, unpack and place clothes directly into washer, then dryer
- reduce clutter at home
- heat smaller infested articles to 113° for 1 hour
- freeze smaller articles at 0° F for 4 days
- place interceptor traps under bed legs
- encasements around mattresses and box springs
- wash and dry bedding items (but not Pro-Tek products).
- insecticidal sprays labeled for killing bed bugs

60012

EPA Reg. No. 83122-1

"Pro-Tek 50 Fabric/Apparel (Garment) Treatment"

April 25, 2011 DPR-based changes to

label that was submitted to USEPA on Mar 15, 2011 resubmitted July 6, 2011

{Insert into package of Apparel/Fabric or hang-tag. Note: May be removed by consumer after purchase.}

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

This <fabric><apparel><garment> has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

{Following claims are for treated fabric, apparel or garments}

<Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.>

<Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.>

{Following two claims are for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers and other non-washable items}

<Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.>

<Repels mosquitoes for 6 months of outdoor exposure to the elements.>

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item in each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat <fabric><apparel><garment> with other permethrin insect repellent products. [For repellency protection of exposed skin, use with insect repellent approved for topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

{Bed Bug Products Only}

Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours. Insecticidal (killing) action remains effective for up to 20 washings, if item fits in washer. If item does not fit in washer, [DO NOT WASH, instead wipe clean with a damp cloth or sponge]

{DIRECTION FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS}

{For Bed Band}

<Stretch><Position> Bed Band around <sides><edges> of mattress and secure tightly using [the Velcro® or other] closures provided. Band wraps around all four sides of the mattress. Bed band should be placed around <sides><edges> of mattress before bed is made and sheet is placed on mattress. Sheet should cover bed band so that band does not contact person lying on bed.

{For Bedskirt or Dust Ruffle}

Remove mattress. Place [fabric] over top of box spring or foundation so that it entirely covers it, with the <skirt><dust ruffle> draping around all four sides. Replace the mattress on top of the covered box spring or foundation. [The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.]

{For Headboard Backing}

Remove headboard and place on floor, <front side><face> down. Attach [treated] backing to back of headboard by tacking, stapling or with glue. With treated backing towards wall, reattach headboard to bed or hang on wall at head of bed as appropriate.

{For Box Spring Protector}

Place box spring inside <pouch> <cover> so that it is completely enclosed in the treated fabric, then <zip the <pouch> <cover> closed.>< secure bottom edge of <pouch><cover> with stitched gathered elastic.>

{For Under Mattress Pad}

Remove mattress. Place pad on box spring and secure with straps. Replace mattress over box springs. If bed does not have box springs, lay pad directly on foundation, without use of straps provided. Replace mattress on box spring or foundation.

80912

{For Under Furniture Fabric}

Place or secure under furniture fabric under furniture or underneath upholstery cover.

{For Storage or Travel Bag}

Place items to be protected from bed bugs directly in <storage> [or]<travel bag>.

{For Fitted Under Mattress Pad}

Fitted under mattress pad is attached to underside of mattress, covering bottom and sides. Use elastic gathered corners to secure pad to mattress. Place mattress cloth side down on the box spring or bed platform.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

<RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS

<APPAREL> <FABRIC><PRODUCT>.>

<THIS INSERT IS][NOT TO BE REMOVED EXCEPT BY CONSUMER.>]

{Label {small tag} sewn into washable fabric}

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

{For bed bug products}

Kills Bed Bugs that stay in contact
for at least 24 hours.

Insecticidal activity remains

Effective up to 20 washings.

Use in Integrated Pest Management program

{For fabric/apparel/garments}

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges

Repellency remains effective
through 25 washings

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

**This product alone is not intended
as a complete solution to bed bug infestations,
but for use with other products and
methods, as listed on the main label.**

100A12

• Label for Dog Bandanas

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

DOG BANDANA

This bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50 Fabric/Apparel (Garment)** Treatment that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana <covers>< <is affixed to> the dog. To protect your dog, a product that provides complete body <protection><coverage> must be used.

Repellency remains effective for 25 washings or 6 months if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1.

EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:	
Permethrin	0.52%
Other Ingredients:	<u>99.48%</u>
Total	100.00%

Manufactured by:
Gamik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

110412

DIRECTIONS FOR USE *{for Pro-Tek 50 Fabric/Apparel (Garment) Treatment dog bandana}*

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Wrap bandana around dog's neck making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana <covers><is affixed to> the dog. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat this bandana with other permethrin insect repellent products.

Wash this bandana separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. [THIS INSERT IS] NOT TO BE REMOVED EXCEPT BY CONSUMER.]

120412

{tag sewn on bandana}

**PRO-TEK 50 Fabric/Apparel
(Garment) Treatment**

Dog Bandana

Do Not Dry Clean

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges.

Repellency remains effective through 25 washings; or
for six months if left unwashed.

----- (fold line) -----

Active Ingredient:

Pennethrin 0.52 %

PA Reg. No. 83122-1

EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to full label for more
information.

DATE OUT: 07/13/2011

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF: TGAI []; MUP []; EUP [X]**

BARCODE NO.: 391349 REG./FILE SYMBOL NO.: 83122-1

PRODUCT NAME: PRO-TEC 50 Fabric/Apparel (Garment) Treatment MRID NOS: 466614-01, 465075-01, and 484433-01

COMPANY NAME: Garnik Industries, LLC ACTION CODE: 676

FROM: Sergey Alekseyev, Chemist
Product Chemistry Team
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)



MSP

TO: Bonnie Adler, CRM
Risk Management and Implementation Branch V
Pesticide Re-evaluation Division (7508P)

INTRODUCTION:

A Reregistration Eligibility Decision (RED), Case No. 2510, Amended RED, and Revized RED were issued on April 2006, 12/20/2007, and 05/11/2009, respectively, for the Active Ingredient Permethrin. According to the RED, the generic database supporting the reregistration of Permethrin for currently registered uses has been reviewed and found to be substantially complete.

In the 8-month response to the Permethrin RED, Garnik Industries, LLC provided EPA Form 8570-35 (Data Matrix), dated 06/01/2011; EPA Form 8570-4 (Confidential Statement of Formula), one basic and one alternative formulations, dated 06/14/2011; a draft label, punch date 06/17/2011; a letter to CRM, dated 07/13/2011; and MRID Nos. 466614-01, 465075-01, and 484433-01. The registrant is requesting reregistration of the product, PRO-TEC 50 Fabric/Apparel (Garment) Treatment, EPA Reg. No. **83122-1**.

FINDINGS:

1. EPA Reg. No. **83122-1** is an end-use product containing the active ingredient Permethrin ((3-pitenoxyphenyl)methyl 3-(2,2-dichloroethenyl)-2,2-dimethylcyclopropane carboxylate), with a label claim nominal concentration of 0.52%, and inert ingredients content of 99.48%. The product is for use in treatment of fabric/apparel (garment). The product is produced by a non-integrated system.
2. The CSFs for both formulations are not acceptable. All ingredients are cleared for use in pesticide formulations. However, the CSF, cells 13b, 14a, and 14b, contains values of the nominal concentration and the certified limits of the source material [REDACTED] Meanwhile said cells should contain also respective values for the active ingredient in parentheses (0.52, 0.58, and 0.48, respectively). Further, the certified limits for water have not been shown with any reasoning or explanation.
3. Data reported for MRID Nos. 466614-01, 465075-01, and 484433-01 satisfy the product chemistry data requirements under Subgroups A and B which pertain to Product Identity and Composition, and Physical and Chemical Properties, respectively.

THIS REVIEW CONTAINS FIFRA CBI

Note: MRID No. 466614-01 pertains to the product Bond-It Insect Repellent Fabric Treatment which is essentially the same as the subject product (see the letter to CRM). MRID No. 465075-01 pertains to the product Permabond Insect Repellent Fabric Treatment which was transferred to abovementioned product Bond-It Insect Repellent Fabric Treatment and therefore is essentially the same as the subject product.

4. The Ingredients Statement on the draft label is acceptable as per CFR §156.10(g) and PR Notices 91-2 and 97-6. No data are present to trigger the need for a Physical or Chemical Hazards Statement. The Storage and Disposal Statements are acceptable in accordance with CFR §156.10(i)(2)(ix) and PR Notice 83-3.

CONCLUSIONS:

The registrant will satisfy the product chemistry requirements for the reregistration of EPA Reg. No. 83122-1 after submission the corrected CSF (see Finding 2).

Product Chemistry Data

Subgroup A: Series 830.1550 - 830.1800 (40 CFR 158.155 - 158.180)

GUIDELINE REFERENCE NO. (GRN)/ TITLE 830	40 CFR §	MRID Number	Data Fulfilled
.1550 Product Identity and Composition	158.320	CSF	Y
.1600 Description of Materials Used to Produce the Product	158.325	465075-01	Y
.1620 Description of Production Process	158.330		N/A
.1650 Discussion of Formulation Process	158.165	466614-01	Y
.1670 Discussion of Formation of Impurities	158.167	465075-01	Y
.1700 Preliminary Analysis	158.345		N/A
.1750 Certified Limits	158.350	465075-01	Y
.1800 Enforcement Analytical Method	158.355	465075-01	Y

THIS REVIEW CONTAINS FIFRA CBI

Subgroup B: Series 830.6302 - 7950 (40 CFR 158.190)

Guideline Reference No. (GRN) / Title 830	Value or Qualitative Description	MRID Number	Data Fulfilled
.6302 Color	Multicolor	465075-01	Y
.6303 Physical State	Cloth	465075-01	Y
.6304 Odor	Mild characteristic odor	465075-01	Y
.6313 Stability	The product is not TGA/MP		N/A
.6314 Oxidation/ Reduction Chemical Incompatibility	The product does not contain oxidizer/reducer	465075-01	Y
.6315 Flammability/Flame Extension	The product is not combustible liquid	465075-01	N/A
.6316 Explodability	The product does not contain explosive	465075-01	N/A
.6317 Storage Stability	The product is stable after 1 year at RT	484433-01	Y
.6319 Miscibility	The product is not emulsifiable liquid	465075-01	N/A
.6320 Corrosion Characteristics	No corrosion attack upon container material after 1 year at RT	484433-01	Y
.6321 Dielectric Breakdown Voltage	The product is not intended to be used around electrical equipment	465075-01	Y
.7000 pH	5-8.5	465075-01	Y
.7050 UV/ Visible Light Absorption	Not applicable. The product is not TGA/MP.	465075-01	N/A
.7100 Viscosity	The product is not liquid	465075-01	N/A
.7200 Melting Point	Not applicable. The product is not TGA/MP.		N/A
.7220 Boiling Point	Not applicable. The product is not TGA/MP.		N/A
.7300 Density/ Bulk Density	0.49 wt.oz/ft ³	465075-01	Y
.7370 Dissociation Constant in Water	Not applicable. The product is not TGA/MP.		N/A
.7550 Octanol/ Water Partition Coefficient	Not applicable. The product is not TGA/MP.		N/A
.7840 Solubility to Water and Organic Solvents	Not applicable. The product is not TGA/MP.		N/A
.7950 Vapor Pressure	Not applicable. The product is not TGA/MP.		N/A

Explanations: Y = Requirement fulfilled; N = Requirement not fulfilled; N/A = Not applicable; G = Data gap;
U = Upgradeable; I = Incomplete or in progress; W = Waived

THIS REVIEW CONTAINS FIFRA CBI

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

August 5, 2011

Ms. Bonnie Adler, Chemical Review Manager
Product Registration Division
Mail Code: 7508P
Office of Pesticide Programs/USEPA
Document Processing Desk (RED-PRD-PRB)
Room S-4900
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Permethrin Product Data Call-In: 8-month Response
 ID # PDCI-109701-26513
 Pro-Tek 50 Fabric/ Apparel (Garment) Treatment, Reg. No. 83122-1
 Confidential Statement of Formula

Dear Ms. Adler,

Enclosed please find revised Confidential Statement of Formula for Garnik Industries, LLC's Pro-Tek 50 Fabric/ Apparel (Garment) Treatment (Reg # 83122-1).

If you have any questions or need anything further, please do not hesitate to contact us.

Best regards,



Robin G. Todd, PhD, BCE
Agent & Technical Consultant

cc. Gary Innocenti
William Ball



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RE: *Confidential: Permethrin Product chemistry and Acute toxicity reviews for 83122-1

Robin Todd to: Bonnie Adler

08/03/2011 04:42 PM

Cc: "Ellen Quinn", "Susan Livingston", "Samuel Grimard", "Reg Coler",
"Janice Asato"

Please respond to rtodd

Bonnie Adler	*Confidential: Permethrin Product chemistry and Acute toxicity reviews
Robin Todd	<i>Hi bonnie, Thanks very much. I am very pleased that your review</i>
Bonnie Adler	<i>Robin, If the mosquito information is in relation to the Pl</i>
Bonnie Adler	<i>Robin, If the mosquito information is in relation to the</i>

Hi bonnie,

Thanks very much. I am very pleased that your reviewers have approved everything except the CSF.

For the CSF I see that nominal values of the AI are required parenthetically in cells 13b, 14a and 14b. We will take care of this. But I do not understand his reference to the certified limits for [REDACTED]

[REDACTED] Please can you ask him about this?

By the way, we submitted the mosquito protection report (based on work done by Uli Bernier of CMAVE in Gainesville) to Rich Gebken, attention Kevin Sweeney. I copied you on the cover letter - let me know if you need a copy of the report.

Best regards,

Robin
Robin G. Todd PhD, BCE
Agent & Technical Consultant
Garnik Industries, LLC
c/o Dillon Heights Avenue
Baltimore, MD 21228-1199
USA
tel 410-747-4500
fax 420-747-4928
RTodd@icrlab.com

-----Original Message-----

From: Bonnie Adler [mailto:Adler.Bonnie@epamail.epa.gov]

Sent: Wednesday, August 03, 2011 3:14 PM

To: rtodd@icrlab.com

Decision Information for 83122-1

Decision Seq: 413202 Action Code: 676 Product Reregistration Decision, 0

FFS Start Date: Tentative Ind: No FFS Original Decision:

Due Date: 75-Day Due Date: FFS ELP Decision:

OPP Target Due Dt: 21-Day Screen Dt: FFS Primary Decision:

Negotiated Due Dt: Start/Stop Clock: FQPA Clock:

Registrant: Product Rereg Ing: 109701 Days Elapsed:

Current Status: PENDING (19-Oct-2009)

Decision Comments	Payment	Unmatched Payments	75 Day Letters
Meetings & Milestones	FFS Information	FFS Negotiated Due Dates	OPP Target Due Date
Decision Ownership	Receipts	Data Package	Reduced Risk

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S: 898499	DeLuise, Linda	83122-1	17-Jun-2011	PENDING
8 month response				
S: 878210	DeLuise, Linda	83122-1	01-Jul-2010	PENDING
8 month response				
S: 860503	Adler, Bonnie	83122-1	15-Oct-2009	PRODUCT REREGISTRATION TO BE
90 day response				

Viewing Record 1 of 1



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83122-1	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Pro-Tek 50 Apparel (Garment) Treatment	PM# PM 10	
5. Name and Address of Applicant (Include ZIP Code) Garnik Industries, LLC, 219 Scott Street, #182 Beaufort, SC 29902-5554 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

8-Month response to PDCI for permethrin (PDCI-109701-26513)

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	PLASTIC
If "Yes" Unit Packaging wgt. No. per container			If "Yes" Package wgt. No. per container	<input type="checkbox"/> Glass	
1				<input type="checkbox"/> Paper	
				<input checked="" type="checkbox"/> Other (Specify) BAG	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container n/a - apparel		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other PAPER INSERT + HAND TAG			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Robin G. Todd PhD, BCE	Title Agent & Tech. Consultant	Telephone No. (Include Area Code) 410-747-4500
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title Agent & Tech. Consultant	
4. Typed Name Robin G. Todd PhD, BCE	5. Date Jun 1, 2011	

LIST OF STUDIES TO BE CONDUCTED AND CONTRACT LABORATORIES

REGISTRANT: Garnik Industries, LLC
c/o 1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

CASE # and NAME: 2510 PERMETHRIN

PRODUCT SPECIFIC ID #: PDCI-109701-26513

PRODUCT: Pro-Tek 50 Fabric/Apparel (Garment) Treatment
EPA Reg. # 83122-1
0.52% permethrin
99.48% [REDACTED]

STUDY TYPES - CONTRACT LABORATORIES COMMENTS & GUIDELINE Nos.

Product Chemistry - Eurofins Product Safety Labs

<i>Physical and Chemical Characteristics: Color, Physical state, Odor, Oxidation/reduction, Flammability, pH, Viscosity and Density</i>	Color, Physical state, Ddor and Density will be by self-certification. Others in series are not applicable (see separate sheet for rationales)
---	---

<i>Storage stability and Corrosion Characteristics</i>	(830.6317 & 830.6320)
--	-----------------------

Acute Toxicology – Eurofins Product Safety Labs

<i>Acute Oral Toxicity –Up-and-down Procedure in Rats</i>	870.1100
<i>Acute Dermal Toxicity in Rats</i>	870.1200
<i>Acute Inhalation Toxicity in Rats</i>	<i>waiver rationale attached</i>
<i>Primary Eye Irritation in Rabbits</i>	870.2400
<i>Primary Skin irritation in Rabbits</i>	870.2500
<i>Dermal Sensitization Test in Guinea Pigs – Buehler Method</i>	870.2600

The protocols have been signed by Mr. William Ball of Garnik Industries LLC. EP5L policy does not permit their study directors to sign protocols until samples are received. The samples of Pro-Tek 50 should be shipped to EP5L by November 3 1, 2009. EP5L study directors will sign the protocols. Work can then start on the studies.

Efficacy – ICR

Treatments to control pests of humans and pets

Mosquitoes (3 species),
'arm-in-cage' tests with
Human subjects (810.3300)
to document protection from
bites.

Extension request (attached)
based on long lead time needed
to secure EPA/HSRB approval
of protocol and related
documents

Bed bugs (wild strain) test to
document kills claim when
exposed to fabric items
with bedding (but only items
to which exposure will not
occur to people lying on the
beds)

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

April 4, 2011

Ms. Bonnie Adler, Chemical Review Manager
Product Registration Division/
Product Reregistration Branch 7508P
Office of Pesticide Programs / USEPA
Document Processing Desk (RED-PRD-PRB)
Room S-4900,
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Permethrin Product Data Call-In: 8-month Response
ID # PDCI-109701-26513
Pro-Tek 50 Fabric/Apparel (Garment) Treatment
EPA Reg. No. 83122-1

Dear Ms. Adler,

Please find enclosed three copies of the study titled "Storage Stability and Corrosion
48443301 Characteristics".

This study fulfills OPPTS Guidelines 830.6317 and 830.6320.

If you have any questions about this study, please do not hesitate to contact Ellen Quinn, Susan Livingston, or myself (all at 410-747-4500 or at Equinn@icrlab.com, SLivingston@icrlab.com, or Rtodd@icrlab.com.)

Yours sincerely,



~~Robin G. Todd, PhD, BCE~~
Agent & Technical Consultant
Garnik Industries, LLC

Encl.

cc. Wm. Ball
G. Innocenti
J. Erdheim

OPPTS 870.2400

ACUTE EYE IRRITATION

WAIVER RATIONALE - PRO-TEK 50 FABRIC/APPAREL (GARMENT) TREATMENT (EPA Reg. No. 83122-1)

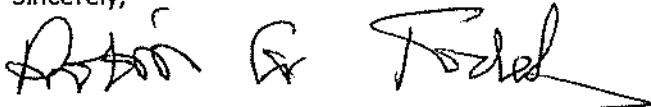
Under the Permethrin Product Data Call-In (PDCI-109701-26513), an eye irritation study is required for Pro-Tek 50 Fabric/Apparel (Garment) Treatment ('Pro-Tek'). The objective of an eye irritation study is to assess the irritant and/or corrosive properties of a pesticide product when introduced to the eye of one or more rabbits. The product is introduced into the eye by placing 0.1mL of the test product in the conjunctival sac of the eye.

Pro-Tek 50 is a permethrin-based liquid formulation which is applied to fabric used in clothing or bedding by a proprietary procedure such that it can survive at least 20 washings and still protect against insect attack. Garnik Industries LLC's ('Garnik') contractor for the toxicology tests, Eurofins Product safety Labs ('EPSL') raised the concern that an eye irritation study on Pro-Tek would not provide useful information. EPSL representatives alerted Garnik to their concerns and then spoke with Dr. Byron Backus of EPA. Dr. Backus advised that a credible case could be made for a waiver of the eye irritation study.

Since the product is only used when present in fabric articles, such a test would either require the Pro-Tek formulation to be extracted from the fabric and applied in a liquid (not the manner in which people will be exposed to it when using these products) or, the fabric could be ground up into a dust and applied to the eye (not reflective of how people will be exposed to these products). In addition, in the latter scenario, there would very likely be far more irritation caused to the rabbits' eye by the physical abrasive properties of the ground fabric than from the chemical nature of the Pro-Tek residues. Based on these assessments, we feel that it would be an unnecessary expenditure of funds, time, and the suffering of one or more rabbits, to conduct an eye irritation study.

Based on the above consideration, we respectfully request that EPA grant a waiver for the requirement for an eye irritation study on the Pro-Tek product.

Sincerely,



Robin G. Todd PhD, BCE

Agent & Technical Advisor

ORIGINAL SUBMITTED WITH
6/30/10 LETTER

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

June 30, 2010

Ms. Bonnie Adler, Chemical Review Manager
Product Registration Division/ Product Reregistration Branch 750BP
Office of Pesticide Programs
USEPA
Document Processing Desk (RED-PRD-PRB)
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

SUBJECT: Permethrin Product Data Call-In: 8-month Response
ID # PDCI-109701-26513
Prot-Tek 50 Fabric/Apparel (Garment) Treatment
EPA Reg. No. 83122-1

Dear Ms. Adler,

Please find attached our 8-month response for Pro-Tek 50 Fabric/Apparel (Garment) Treatment ('Pro-Tek') consisting of the following studies and one waiver request:

48139101 Acute Oral Toxicity Up and Down Procedure in Rats (Laboratory Study Number 28971)
Fulfills Guideline OPPTS 870.1100

48139102 Acute Dermal Toxicity Study in Rats – Limit Test (Laboratory Study Number 28972)
Fulfills Guideline OPPTS 870.1200

Admin. Acute Eye Irritation - Waiver Rationale – Pro-Tek 50 Fabric/Apparel (Garment) Treatment (EPA Reg. No. 83122-1)

48139103 Primary Skin Irritation in Rabbits (Laboratory Study Number 28974)
Fulfills Guideline OPPTS 870.2500

48139104 Dermal Sensitization Study in Guinea pigs (Buehler Method) (Laboratory Study Number 28975)
Fulfills Guideline OPPTS 870.2600

If you have any questions about our response, please do not hesitate to contact Ellen Quinn, Susan Livingston or myself (all at 410-747-4500 or at Equinn@icrlab.com, SLivingston@icrlab.com or RTodd@icrlab.com).

Yours sincerely,

A handwritten signature in black ink, appearing to read "Robin G. Todd". The signature is fluid and cursive, with the first name "Robin" being the most prominent.

Robin G. Todd PhD, BCE
Agent & Technical Consultant
Garnik Industries, LLC

Encl.

cc. Wm. Ball
G. Innocenti
J. Erdheim

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

June 30, 2010

Ms. Bonnie Adler, Chemical Review Manager
Product Registration Division/ Product Reregistration Branch 7508P
Office of Pesticide Programs
USEPA
Document Processing Desk (RED-PRD-PR8)
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

SUBJECT: Permethrin Product Data Call-In: 8-month Response
ID # PDCI-109701-26513
Prot-Tek 50 Fabric/Apparel (Garment) Treatment
EPA Reg. No. 83122-1

Dear Ms. Adler,

Please find attached our 8-month response for Pro-Tek 50 Fabric/Apparel (Garment) Treatment ('Pro-Tek') consisting of the following studies and one waiver request:

48139101 Acute Oral Toxicity Up and Down Procedure in Rats (Laboratory Study Number 28971)
Fulfills Guideline OPPTS 870.1100

48139102 Acute Dermal Toxicity Study in Rats – Limit Test (Laboratory Study Number 28972)
Fulfills Guideline OPPTS 870.1200

Admin. Acute Eye Irritation - Waiver Rationale – Pro-Tek 50 Fabric/Apparel (Garment) Treatment (EPA Reg. No. 83122-1)

48139103 Primary Skin Irritation in Rabbits (Laboratory Study Number 28974)
Fulfills Guideline OPPTS 870.2500

Permethrin PDCI-109701-26513 - Pro-Tek 50 fabrics - update

Robin L. Todd

to:

Bonnie Adler

06/16/2010 08:56 AM

Cc:

"Ellen Quinn", "Susan Livingston", "Reg Coler", "Gary Innocenti", "Bill Ball - Garnik", "Jeff Erdheim",

"Jeff Erdheim - Jeffrey Fabrics"

Show Details

Hi Bonnie,

We owe you an update on our PDCI response for Garnik's Pro-Tek 50 permethrin impregnated fabric product (EPA Reg. # 83122-1). The studies were contracted out to EPSL. Their status are given below.

12-month Storage stability	study underway at EPSL
Acute oral toxicity	EPSL study completed*
Acute dermal toxicity	EPSL study completed ⁸
Acute inhalation toxicity	Waiver requested
Primary skin irritation	EPSL study completed*
Primary eye irritation study	Waiver request to be submitted**
Dermal sensitization	EPSL study completed*

*the final reports were sent to the wrong address – we have asked for their prompt return – we plan to submit by July 9th

**EPSL cautioned us that this test would not generate meaningful data since the fabric itself would cause more irritation than would the permethrin. EPSL spoke with (I believe) EPA's Byron Backus, who advised submitting a waiver rationale. We will submit this by July 9th.

I apologize for our tardiness and trust that this will not be a problem, but please confirm. Do not hesitate to let me know if you have any questions.

Best regards,

Robin

Robin G. Todd PhD, BCE

Agent & Technical Consultant

Garnik Industries, LLC,

c/o 1330 Dillon Heights Avenue

Baltimore, MD 21228-1199

tel. 410-747-4500

fax. 410-747-4928

Email: RTodd@icrlab.com




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 6/1/2011			EPA Reg No./File Symbol 83122-1		Page 1 of 4
Applicant's/Registrant's Name & Address 219 Scott Street, #182, Beaufort, SC 29902-5554			Product Pro-Tek Fabric/Apparel (Garment) Treatment		
Ingredient permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product identity and composition	465075-01	Garnik Industries LLC	PAY	
830.1600	Description of materials used to produce the product	465075-01	Garnik Industries LLC	PAY	
830.1650	Description of formulation process	465075-01	Garnik Industries LLC	PAY	
830.1650	Description of formulation process	466614-01	Garnik Industries LLC	PAY	
830.1670	Discussion of formation of impurities	465075-01	Garnik Industries LLC	PAY	
830.1750	Certified limits	465075-01	Garnik Industries LLC	PAY	
830.1800	Enforcement analytical method	465075-01	Garnik Industries LLC	PAY	
830.6302	Color	465075-01	Garnik Industries LLC	PAY	
830.6303	Physical state	465075-01	Garnik Industries LLC	PAY	
830.6304	Odor	465075-01	Garnik Industries LLC	PAY	
830.6317	Storage stability	n/a	Garnik Industries LLC	OWN	
830.6320	Corrosion characteristics	n/a	Garnik Industries LLC	OWN	
830.7300	Density/relative density	465075-01	Garnik Industries LLC	PAY	
870.1100	Acute oral toxicity	481391-01	Garnik Industries LLC	OWN	
870.1200	Acute dermal toxicity	481391-02	Garnik Industries LLC	OWN	
Signature 			Name and Title Robin G. Todd PhD, BCE Agent & Technical Advisor		Date 06/01/2011



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

Date 6/1/2011

EPA Reg No./File Symbol 83122-1

Page 3 of 4

Applicant's/Registrant's Name & Address

Product

219 Scott Street, #182, Beaufort, SC 29902-5554

Pro Tek 50 Fabric/Apparel (Garment) Treatment

Ingredient	permethrin
------------	------------

[illegible]

Signature

Robert C. Ford

Name and Title

Robin G. Todd PhD, BCE Agent & Technical Advisor

Date _____

06/01/2011




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reviewing the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date 6/1/2011			EPA Reg No./File Symbol 83122-1		Page/ of 4
Applicant's/Registrant's Name & Address 219 Scott Street, #182, Beaufort, SC 29902-5554			Product Pro-Tek Fabric/Apparel (Garment) Treatment		
Ingredient permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product identity and composition	465075-01	Garnik Industries LLC	PAY	
830.1600	Description of materials used to produce the product	465075-01	Garnik Industries LLC	PAY	
830.1650	Description of formulation process	465075-01	Garnik Industries LLC	PAY	
830.1650	Description of formulation process	466614-01	Garnik Industries LLC	PAY	
830.1670	Discussion of formation of impurities	465075-01	Garnik Industries LLC	PAY	
830.1750	Certified limits	465075-01	Garnik Industries LLC	PAY	
830.1800	Enforcement analytical method	465075-01	Garnik Industries LLC	PAY	
830.6302	Color	465075-01	Garnik Industries LLC	PAY	
830.6303	Physical state	465075-01	Garnik Industries LLC	PAY	
830.6304	Odor	465075-01	Garnik Industries LLC	PAY	
830.6317	Storage stability	n/a	Garnik Industries LLC	OWN	
830.6320	Corrosion characteristics	n/a	Garnik Industries LLC	OWN	
830.7300	Density/relative density	465075-01	Garnik Industries LLC	PAY	
870.1100	Acute oral toxicity	481391-01	Garnik Industries LLC	OWN	
870.1200	Acute dermal toxicity	481391-02	Garnik Industries LLC	OWN	
Signature 			Name and Title Robin G. Todd PhD, BCE Agent & Technical Advisor		Date 06/01/2011



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

Date 6/1/2011

EPA Reg No./File Symbol 83122-1

Page 3 of 4

Applicant's/Registrant's Name & Address
219 Scott Street, #182, Beaufort, SC 29902-5554

Product	Pro Tek 50 Fabric/Apparel (Garment) Treatment
---------	---

Ingredient permethrin

[illegible]

Signature

Robert L. Ford

Name and Title

Robin G. Todd PhD, BCE Agent & Technical Advisor

Date _____

06f0 t/2011

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

REGISTRANT: Garnik Industries, LLC
c/o 1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

CASE # and NAME: 2510 PERMETHRIN

PRODUCT SPECIFIC ID #: PDCI-109701-26513

PRODUCT: Pro-Tek S0 Fabric/Apparel (Garment) Treatment - an end use product
EPA Reg. # 83122-1
0.52% permethrin
99.48% [REDACTED]

RATIONALES FOR DETERMINATION OF 'NOT APPLICABLE' STATUS FOR CERTAIN PRODUCT CHEMISTRY DATA REQUIREMENTS

<u>Guideline Number</u>	<u>Study Title</u>	<u>Rationale</u>
830.1620	Description of production process	Only applicable to TGAs
830.1700	Preliminary analysis	Only applicable to TGAs
830.6313	Stability to sunlight, normal and Elevated temperatures, metals & metal ions	Only applicable to TGAs
830.6314	Oxidizing or reducing action	Required only if product contains oxidizers or reducers
830.6315	Flammability	Required only if product contains combustible liquids
830.6316	Explodability	Product not potentially explosive; it is 99.48% fabric
830.6319	Miscibility	Not an emulsifiable liquid and not for dilution in petroleum solvents

830.6321	Dielectric breakdown Voltage	Not for use around electrical equipment
830.7000	pH of water solutions or suspensions	Not dispersible with water
830.7050	UV/Visible absorption	Only applicable to TGAs and PAIs
830.7100	Viscosity	Required only if product is a liquid
830.7200	Melting point/melting range	Only applicable to TGAs
830.7220	Boiling point/boiling range	Only applicable to TGAs
830.7370	Dissociation constant in water	Only applicable to TGAs
830.7550	Partition coefficient (n-octanol/water) Shake flask method	Only applicable to TGAs and PAIs
830.7570	Partition coefficient (n-octanol/water) estimate by liquid chromatography	Only applicable to TGAs and PAIs
830.7840	Water solubility: Column elution method, shake flask method	Only applicable to TGAs and PAIs
830.7860	Water solubility, generator column Method	Only applicable to TGAs and PAIs
830.7950	Vapor pressure	Only applicable to TGAs and PAIs

✓ 6-24-11

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

June 16, 2011

Ms. Bonnie Adler, Chemical Review Manager
Product Registration Division
Product Reregistration Branch 7508P
Office of Pesticide Programs / USEPA
Document Processing Desk (RED-PRD-PRB)
Room S-4900,
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Subject: Permethrin Product Data Call-In: 8-month Response
ID # PDCI-109701-26513
Pro-Tek 50 Fabric/Apparel (Garment) Treatment, EPA Reg. No. 83122-1
Administrative forms

Dear Ms. Adler,

As requested, we are pleased to enclose the following to complete our 8-month response to the PDCI:

1. Application form (8570-1)
2. Confidential statement of formula (8570-4)
Basic and Alternate – 2 copies of each
3. Formulator's exemption (8570-27)
4. Certification with respect to citation of data (8570-34)
5. Data matrix (8570-35)*
6. Product label** – 3 copies
7. Copy of waiver rationale for primary eye irritation study (originally submitted with my June 30, 2010 letter – you noted being unable to locate this document)
- 8.

*For the data matrix, please note that offers-to-pay were made by the previous agent for Garnik (Biologic Inc.) in 2006. A copy of their 2006 data matrix is attached, giving the identities of the entities to whom these letters were sent.

**The label attached is the latest approved by EPA. This product is only being sold for use against bed bugs. Therefore all labels approved for state registrations are for this use, under the TMSweep brandname, subregistered by Innovative Textile Solutions. For this reason the Pro-Tek label has not been converted to a retail form for use on the product in commerce.

JUN 23 2011

gx
6/23/11

If you have any questions about this study, please do not hesitate to contact Ellen Quinn, Susan Livingston, or myself (all at 410-747-4500 or at Equinn@icrlab.com, SLivingston@icrlab.com, or Rtodd@icrlab.com.)

Yours sincerely,



Robin G. Todd, PhD, BCE

~~Agent & Technical Consultant~~

Garnik Industries, LLC

Encl.

cc. Wm. Ball
G. Innocenti
J. Erdheim



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Garnik Industries, LLC 219 Scott Street, #182 Beaufort, SC 29902	EPA File Symbol/Registration Number 83122-1
	Product Name Pro-Tek 50 Fabric/Apparel (Garment) Treatment
	Date of Confidential Statement of Formula (EPA Form 8570-4) 09/29/2008

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

permethrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
permethrin		
permethrin		
Signature 		Name and Title Agent & Technical Consultant
		Date 06/01/2011

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
 Gamik Industries, LLC, 219 Scott Street, #182, Beaufort, SC 29902-5554

EPA Registration Number/File Symbol
 83 t22- t

Active Ingredient(s) and/or representative test compound(s)
 permethrin

Date
 June 1, 2011

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
 Indoor

Product Name
 Pro-Tek 50 Fabric/Apparel (Garment) Treatment

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☒ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Robin G. Todd

Date

June 1, 2011

Typed or Printed Name and Title

Robin G. Todd PhD, BCE Agent & Tech Consultant

EXTENSION REQUEST FOR AN EFFICACY STUDY ON PROTECTION FROM
MOSQUITO BITES GIVEN BY PERMETHRIN-IMPREGNATED CLOTHING
USING HUMAN SUBJECTS

REGISTRANT: Garnik Industries, LLC
c/o 1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

CASE # and NAME: 2510 PERMETHRIN

PRODUCT: Pro-Tek 50 Fabric/Apparel (Garment) Treatment
EPA Reg. # 83122-1
0.52% permethrin
99.48% [REDACTED]

DATA FOR WHICH EXTENSION IS REQUESTED:

OPPTS 810.3300 – Treatments to Control Pests of Humans and
Pets

Preamble – the New Final Rule

On April 7, 2006 EPA's new final rule, governing the use of human subjects in pesticide studies, came into effect. A key part of this rule is the requirement that the protocols and informed consent documents ('ICDs') for all studies involving the deliberate exposure of human subjects to pesticides must be reviewed and approved in advance by EPA and by the newly-formed Human Studies Review Board ('HSRB'). The HSRB consists of about 18 academicians who are experience in toxicology, statistics, the ethics of clinical trials, pharmacology and other relevant disciplines.

Approval Process for Human Study Protocols

The procedure that has evolved since that time begins with the group who intend to conduct such a study, normally a contract laboratory (henceforth the 'laboratory'), writing a protocol and an ICD and assembling other study related documents, such as MSDS and subject recruitment scripts (henceforth 'necessary study documents'). These documents are submitted to an Institutional Review Board ('IRB'). The role of the IRB is to assure compliance with all relevant regulations governing the use of human subjects in clinical trials. In the case of EPA's final rule these are found in 40 C.F.R. Part 26 Subparts K and L when it uses human subjects in studies.

These regulations are designed to ensure that all subjects are treated ethically, that any potential hazard is minimized, and that they are fully informed about the study and the risks and benefits of participating in it. The IRB will usually request that certain revisions be made before they will approve both documents. The time required for IRB review, revisions, and approval is normally about three weeks.

Once the IRB has approved the protocol and the ICD, the laboratory assembles them into a single continuously paginated volume, formatted per PR Notice 86-5 and submits it to EPA. The HSRB meets with EPA officials on an approximately quarterly basis to discuss the necessary documents for propose studies as well as final reports. EPA requires that all submissions be made at least 75 days in advance of the next HSRB meeting in order for it to be placed on the agenda for that meeting. EPA officials then spend about one month reviewing the necessary study documents, advising the laboratory of any revisions needed (in ICR's experience, there have always been revisions required). The revised necessary study documents must then be re-submitted to the IRB for review and approval. Following this the revised necessary study documents are again submitted to EPA. The Agency checks that the revisions have been made and then forward it to the HSRB for their review.

The HSRB members review these documents separately before gathering for their meeting at EPA's Crystal City offices. At this meeting EPA officials present their analysis of the scientific and ethical aspects of the proposed study. The laboratory will have their study director and other staff present to answer questions and to make comments to the HSRB. The HSRB then debates the merits of the proposed study in detail and at some length. The precedent so far is that the HSRB always requires additional revisions to those required by EPA. Although these changes can be predicted to some extent by the laboratory staff attending the meeting, the definitive recommendations as to revisions are only to be found in the final report of the HSRB. These usually appear within a month, although they have taken nearly three months in some cases.

Once the HSRB final report is available, the lab revises the necessary study documents a third time, if needed, and submits them to the IRB for review and approval. The newly revised versions can then be submitted to EPA for the next HSRB meeting. Owing to the time needed for the final HSRB report to appear, revision of the documents by the lab, review and approval by the IRB, the 75-day deadline for the next HSRB meeting may already have come and gone when the thrice revised documents are submitted to EPA. It should be noted that the 75-day rule may be waived since the necessary study documents should now be close to a form which EPA and HSRB will accept. But this cannot be taken for granted.

To date, the time elapsed between submitting a necessary study documents to EPA and having them approved has exceeded 12 months.

The Proposed Study

The known dates for upcoming meetings of the HSRB are October 20-21, 2009, January 12-15, 2010, April 13-16 2010 and June 23-25, 2010.

The proposed study is intended to support two chemically identical permethrin-impregnated fabric products: Pro-Tek 50 and Bond-It Insect Repellent Fabric Treatment (EPA Registration Number 48139-15). They differ only in their uses and markets. Thus

Pro-Tek 50 is labeled for killing bed bugs in addition to the repellent claims of Bond-It. Bond-It treated fabrics are marketed to the US Marine Corps for making uniforms while Pro-Tek 50 treated fabrics are for non-military uses.

The mosquito current label claims for Bond-It and Pro-Tek 50 are based on a 2004 protocol developed by Dr. Ulrich Bernier of USDA/ARS/CMAVE, Gainesville FL, entitled '*Laboratory Evaluation of Bite Protection from Permethrin-impregnated United States Military Clothing*'. (IRB version 03.09.04). This protocol was written prior to the new final rule and will therefore need to be extensively revised to comply with the new final rule. The method involves human subjects placing their arms in sleeves of treated fabric and inserting them into cages of mosquitoes for 15 minutes. Mosquitoes have the opportunity to land and bite the subjects through the sleeves, biting being evidenced by the swollen abdomens of these insects.

As can be deduced from the forgoing description of necessary study documents approval process, it will not be possible to conduct a study involving human subjects to support the mosquito protection claims of Bond-It and Pro-Tek 50 in time for submission of the final report by March 16, 2010 EPA PDCI deadline.

Extension Requested

We therefore respectfully request an extension of the deadline for submission of the final report as follows. We would submit an IRB-approved protocol and ICD to EPA by January 28, 2010 so as to allow it to be placed on the agenda for the April 13-16 HSRB meeting. Based on precedent, the necessary study documents will need revision, followed by consideration at a second HSRB meeting in June or October. The study will be conducted indoors in a laboratory setting at ICR so it can be run at any time of the year.

It is impossible to accurately predict the EPA or HSRB's recommendations for any study. In the case of the proposed study, it should be noted that it will probably be the first one on impregnated cloth for protection from mosquito bites submitted for EPA and HSRB review. Therefore these two bodies are likely to have many questions and the revisions needed could be many and extensive.

Based on the forgoing, we ask that the deadline for submitting the report for this study to EPA be four months after the date when the Agency and the HSRB approve the protocol, ICD and other necessary study documents. This will allow time for recruiting the required mixture of subjects, rearing the thousands of mosquitoes needed, running the study and then writing the report and having Q/A performed.

Please do not hesitate to contact us with any questions.

Sincerely,

A handwritten signature in black ink that reads "Robin G. Todd". The signature is fluid and cursive, with the first name "Robin" being the most prominent.

Robin G. Todd PhD, BCE
Agent and Technical Consultant

Tel. 410-747-4500
Fax. 410-747-4928
RTodd@icrlab.com

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

SIX TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON & AROUND BEDS

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

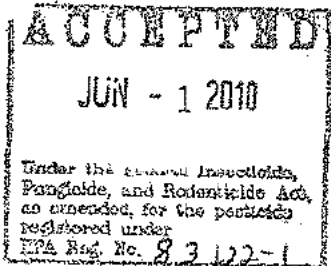
Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours. If no box spring, use under mattress pad that does not have bands.

6. Under Furniture Pad

Place under furniture pad underneath item of furniture and secure. Kills bed bugs that remain in contact with treated under furniture pad for at least 24 hours.



Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50
Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours
Insecticidal (killing) action remains effective for up to 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin

0.52 %

Other Ingredients:

99.48 %

Total

100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item each package

- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] [under mattress pad] [under furniture pad] for at least 24 hours
- Bed bugs come out to feed on human hosts
- Bed bugs typically feed at night
- Bed bugs may hide in your headboard and lay eggs
- Blood taken from humans is the food of bed bugs
- Bed bug bites may cause welts which become irritated, inflamed and itchy
- Bed bug colonies may cause offensive odors
- Female bed bugs can lay over 200 eggs in their lifetime
- Newly hatched bed bugs begin feeding immediately
- Bed bugs have a piercing beak
- Treated fabric has no odor and is washable up to 20 times
- Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- "New" (for allowable time frame)
- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] for at least 24 hours.
- Insecticidal (killing) action remains effective for up to 20 washings.
- Kills bed bugs that stay in contact with fabric for at least 24 hours between your box spring and mattress, or under mattress if no box spring – *(for box spring protector, under mattress pad and dust ruffle only)*
- Kills bed bugs that stay in contact with under furniture pad for at least 24 hours.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

1. Bed Band

Stretch bed band around edges of mattress and secured tightly using the Velcro or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact to persons lying on the bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.]

4. Box Spring Protector

Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

5. Under Mattress Pad

Place pad between mattress and box spring and secure with straps. If no box spring, lay strapless under mattress pad on surface directly beneath mattress.

6. Under Furniture Pad

Place pad under furniture and secure as directed.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs that
stay in contact for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

NEW

Label for Dog Bandanas

Master Label Pro-Tek 50 Fabric (including Dog Bandana)

PRO-TEK 50 DOG BANDANA

The Pro-Tek 50 Bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50** that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana covers [is affixed to] the dog [pet]. To protect your dog, a product that provides complete body protection must be used.

Repellency remains effective for 25 washings.

Repellency to mosquitoes remains effective for 6 months of exposure to weathering if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

NEW

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Wrap bandana around dog's neck, making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana covers [is affixed to] the dog [pet]. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat Pro-Tek 50 Dog Bandanas with other permethrin insect repellent products.

Wash Pro-Tek 50 Dog Bandanas separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS
FABRIC. NOT TO BE REMOVED EXCEPT BY CONSUMER.]

NEW

Master Label: Pro-Tek 50 Dog Bandana

Hang tag sewn on bandana:

PRO-TEK 50 Dog Bandana

Do Not Dry Clean

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings; or
for six months if left unwashed]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to label for more
information.

United States Environmental Protection Agency
Washington, DC 20460



Form Approved
OMB No. 2070-0107,
2070-0057
Approval Expires
3-31-99

**CERTIFICATION WITH RESPECT TO
DATA COMPENSATION REQUIREMENTS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to, Chief Information Policy Branch, PM-233, U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460; and to the Office of Management and Budget, Paperwork Reduction Project (2070-0106), Washington, DC 20503.

Please fill in blanks below.

Company Name

Garnik Industries, LLC

Company Number

83122

Product Name

PRO-TEK 50 Fabric / Apparel (Garment) Treatment

EPA Reg. No.

83122-1

I Certify that:

1. For each study cited in support of registration or reregistration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) that is an exclusive use study, I am the original data submitter, or I have obtained the written permission of the original data submitter to cite that study.
2. That for each study cited in support of registration or reregistration under FIFRA that is NOT an exclusive use study, I am the original data submitter, or I have obtained the written permission of the original data submitter, or I have notified in writing the company(ies) that submitted data I have cited and have offered to: (a) Pay compensation for those data in accordance with sections 3(c)(1)(F) and 3(c)(2)(D) of FIFRA; and (b) Commence negotiation to determine which data are subject to the compensation requirement of FIFRA and the amount of compensation due, if any. The companies I have notified are. (check one)

☐ The companies who have submitted the studies listed on the back of this form or attached sheets, or indicated on the attached "Requirements Status and Registrants' Response Form."
3. That I have previously complied with section 3(c)(1)(F) of FIFRA for the studies I have cited in support of registration or reregistration under FIFRA.

Signature

Robin G. Todd

Date

10/13/09

Name and Title (Please Type or Print)

Robin G. Todd Agent & Technical Advisor

GENERAL OFFER TO PAY: I hereby offer and agree to pay compensation to other persons, with regard to the registration or reregistration of my products, to the extent required by FIFRA section 3(c)(1)(F) and 3(c)(2)(D).

Signature

Robin G. Todd

Date

10/13/09

Name and Title (Please Type or Print)

Robin G. Todd Agent & Technical Advisor



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Garnik Industries, LLC 219 Scott St; Unit 182 Beaufort, SC 29902	EPA File Symbol/Registration Number 83122-1
	Product Name PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
	Date of Confidential Statement of Formula (EPA Form 8570-4) 9/29/08

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):



(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active ingredient	Product Name	Registration Number
Permethrin		
Permethrin		
Signature 	Name and Title Robin G. Todd Agent & Technical Advisor	Date 10/13/09

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

DATA CALL-IN RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address GARNIK INDUSTRIES, LLC 1330 DILLON HEIGHTS AVENUE BALTIMORE, MD 212281199		2. Case # and Name 2510 Permethrin Chemical # and Name 109701 Permethrin		3. Date and Type of DCI and Number 28-May-2009 PRODUCT SPECIFIC ID # PDCI-109701-26513	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
83122-1		N.A.	N.A.		yes
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <u>Robin G. Todd</u> Agent				9. Date <u>10/12/09</u>	
10. Name of Company <u>Robin G. Todd for Garnik Industries, LLC</u>				11. Phone Number <u>410-747-4500</u>	

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address GARNIK INDUSTRIES, LLC 1330 DILLON HEIGHTS AVENUE BALTIMORE, MD 212281199		2. Case # and Name 2510 Permethrin EPA Reg. No. 83122-1			3. Date and Type of DCI and Number 28-May-2009 PRODUCT SPECIFIC ID # PDCI-109701-26513				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
	Product Chemistry Data Requirements (Conventional Chemical)								
830.1550	Product identity and composition (32)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/MP/EP	8	1
830.1600	Description of materials used to produce the product (33)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/MP/EP	8	1
830.1620	Description of production process (34)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA	8	8
830.1650	Description of formulation process (35)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	1
830.1870	Discussion of formation of impurities (36)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/MP/EP	8	1
830.1700	Preliminary analysis (26, 27, 37)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA	8	8
830.1750	Certified limits (38)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/MP/EP	8	1
830.1800	Enforcement analytical method (39)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/MP/EP	8	1
830.8302	Color (12)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/MP/EP	8	1
830.8303	Physical state (25)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/MP/EP	8	1
830.8304	Odor (21)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/MP/EP	8	1
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <u>Robin G. Todd</u> Agent							11. Date <u>10/12/09</u>		
12. Name of Company <u>Robin G. Todd for Garnik Industries, LLC</u>							13. Phone Number <u>410.747.4500</u>		

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0077

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address GARNIK INDUSTRIES, LLC 1330 DILLON HEIGHTS AVENUE BALTIMORE, MD 212281199		2. Case # and Name 2510 Permethrin EPA Reg. No. 83122-1		3. Date and Type of DCI and Number 28-May-2009 PRODUCT SPECIFIC ID # PDCI-109701-26513					
4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions (28, 29, 40)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA	8	8
830.6314	Oxidizing or reducing action (22)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	8
830.6315	Flammability (17)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	8
830.6316	Explosibility (16)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	8
830.6317	Storage stability of product (41)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	16	8
830.6318	Miscibility (20)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	8
830.6320	Corrosion characteristics (42)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	16	8
830.6321	Dielectric breakdown voltage (15)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	8
830.7000	pH of water solutions or suspensions (23, 24)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/MP/EP	8	8
830.7050	UV/visible absorption					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA/PAI	8	8
830.7100	Viscosity (30)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	MP/EP	8	8
830.7200	Melting point/melting range (19, 19)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGA	8	8
Initial to indicate certification as to information on this page (full text of certification is on page one). <i>R. G. T.</i>							Date	10/12/09	114

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached Instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address GARNIK INDUSTRIES, LLC 1330 DILLON HEIGHTS AVENUE BALTIMORE, MD 212281199		2. Case # and Name 2510 Pemethrin EPA Reg. No. 83122-1		3. Date and Type of DCI and Number 28-May-2009 PRODUCT SPECIFIC ID # PDCI-109701-26513					
4. Guideline Requirement Number	5. Study Title	PROTOCOL	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
830.7220	Boiling point/boiling range (10, 11)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI	8	8
830.7300	Density/relative density (13, 14)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/MP/EP	8	1
830.7370	Dissociation constant in water (47, 48)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	8
830.7550	Partition coefficient (n-octanol/water), shake flask method (49)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/PAI	8	8
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography (54)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI/PAI	8	8
830.7840	Water solubility: Column elution method, shake flask method (50)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	8
830.7860	Water solubility, generator column method (51)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	8
830.7950	Vapor pressure (52, 53)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI or PAI	8	8
Toxicology Data Requirements (Conventional Chemical)									
870.1100	Acute Oral Toxicity (1, 43)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI, EP, dilute EP?	8	1
870.1200	Acute dermal toxicity (2, 3, 44)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI, EP, dilute EP?	8	1
870.1300	Acute inhalation toxicity (4)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	7
Initial to indicate certification as to information on this page (full text of certification is on page one). <i>R-L-T</i>							Date 10/12/09	115	

United States Environmental Protection
Agency Washington, D.C. 20460

OMB Approval 2070-0107
OMB Approval 2070-0057

REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.
Use additional sheet(s) if necessary.

1. Company Name and Address GARNIK INDUSTRIES, LLC 1330 DILLON HEIGHTS AVENUE BALTIMORE, MD 212281199		2. Case # and Name 2510 Permethrin EPA Reg. No. 83122-1		3. Date and Type of DCI and Number 28-May-2009 PRODUCT SPECIFIC ID # PDCI-109701-26513					
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
870.2400	Acute eye irritation (5)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	1
870.2500	Acute dermal irritation (6, 7)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	1
870.2800	Skin sensitization (8, 9)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	TGAI & EP	8	1
970.7200	Companion animal safety (31)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	CHOICE	8	8
810.3300	Treatments to control pests of humans and pets (45)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	EP	8	1
810.3500	Premises treatments (46)					A, B, C, D, E, F, G, H, I, J, K, L, M, N, O	EP	8	8

Initial to indicate certification as to information on this page
(full text of certification is on page one).

R. G. T.

Date

10/12/09

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PRODUCT REREGISTRATION

SUPPORTING DOCUMENTATION

FOR

Case Name: Permethrin

Reg. No. 33122-1

This supporting documentation (in chronological order) includes:

- o Old labels (identified as “*Superseded by label dated*
xx/xx/xx”)
- o Unacceptable CSF (marked “Not acceptable” and dated)
- o Product chemistry reviews
- o Acute toxicity reviews
- o Efficacy and or special studies (if necessary)
- o 90-Day responses to PDCI (forms A and B)
- o Administrative forms (Application for Reregistration
Certification to Data citation, Data Matrix)
- o Correspondence (Company and Agency letters & e-mails)

Material Sent for Data Extraction

Reg. # 83122 - 1

Description: _____

☒ Material(s) Sent to Data Extraction Contractors:

☒ New Stamped Label Dated 8/3/11

☒ Notification Dated 7/19/11

☐ New CSF(s) Dated _____

☐ Other: _____

☐ Decision #: _____

☐ Other Action/Comments: _____

File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image, please file materials in a new jacket and bring it down to the (ISC). For further information please call 703-605-0716.

Reviewer: L. DeLuise

Phone: 305 5428 Division: RD

Date: 8/3/11



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

July 19, 2011

Robin G. Todd
Garnik Industries, LLC
219 Scott St; #182
Beaufort, SC 29902-5554

Subject: Notification(s) for Pesticide Registration Notice 98-10

Dear: Robin Todd:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 dated June 16, 2010 for the following product(s).

PRO-TEK 50 Fabric/Apparel (Garment) Treatment (EPA Reg. No. 83122-1)

The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The Confidential Statement of Formula (CSF) and/or label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please contact Regina Foushee'-Smith at 703-605-0780.

Sincerely,

A handwritten signature in cursive script that reads "Richard Gebken".

Richard Gebken
Product Manager
Insecticide Branch
Registration Division (7505P)

Decision Information for 83122-1

Decision Seq: 450742	Action Code: 332,NOTIFICATION,30	Decision Status
FFS Start Date	Tentative Ind: No	Tracking
Due Date: 17-Jul-2011	75-Day Due Date	Create Resubmission
OPP Target Due Dt	21-Day Screen Dt	FFS Letters
Negotiated Due Dt	Start/Stop Clock	FFS EUP Decision
Registrant	FQPA Clock	FFS Primary Decision
Response Due Date	Days Elapsed	Action Code History
Current Status: PENDING (21-Jun-2011)		Secondary Decision

<input checked="" type="checkbox"/> Decision Comments	<input checked="" type="checkbox"/> Payments	<input checked="" type="checkbox"/> Unmatched Payments	<input checked="" type="checkbox"/> 75 Day Letters
<input checked="" type="checkbox"/> Meetings & Milestones	<input checked="" type="checkbox"/> FFS Information	<input checked="" type="checkbox"/> FFS Negotiated Due Dates	<input checked="" type="checkbox"/> OPP Target Due Date
<input checked="" type="checkbox"/> Decision Ownership	<input checked="" type="checkbox"/> Receipts	<input checked="" type="checkbox"/> Data Package	<input checked="" type="checkbox"/> Reduced Risk

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
<input checked="" type="checkbox"/> S:897970	Foushee-Smith, Regina	83122-1	17-Jul-2011	PENDING

Notification adding a alternate source of active ingredient

Viewing Record 1 of 1

I need approved -

Receipt for Section 3

S: 897970

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Notification

Company: 83122 GARNIK INDUSTRIES, LLC ☒

Risk Manager: Registration Division, Risk Management Team 13

Product #: 83122-1 Product Name: PRO-TEK 50 FABRIC/APPAREL (GARMENT) 1

Overrides:

Me Too Section 3: Me Too Product Name:

Application Date: 16-Jun-2011 ☒

OPP Rec'd Date: 17-Jun-2011 ☒

Front End Date: 17-Jun-2011 ☒

Risk Manager Send Date: 17-Jun-2011 ☒

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Notification request: second alternate source of active ingredient

CSF Notification

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

CSF

View/Edit

332
Reg

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

June 16, 2011

Mr. Richard J. Gebken PM 10
Insecticide Branch, Registration Division
Document Processing Desk (7504P)
Office of Pesticide Programs
U. S. ENVIRONMENTAL PROTECTION AGENCY
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington VA 22202-4501

SUBJECT: Notification request: second alternate source of active ingredient
Pro-Tek 50 Fabric/Apparel (Garment) Treatment (EPA Reg. No. 83122-1)

Dear Mr. Gebken,

Please find attach our request to add a second alternate source of permethrin for Pro-Tek 50
Fabric/Apparel (Garment) Treatment (EPA Reg. No. 83122-1). In support of this we are submitting

1. Form 8570-1
2. Form 8570-4 - showing [REDACTED] as the second alternate source (currently [REDACTED] is listed as the
basic source and [REDACTED] as the alternate source
3. Existing form 8570-4 showing [REDACTED] as the basic source
4. Existing form 8570-4 showing [REDACTED] as the alternate source.
5. Copy of [REDACTED])

[REDACTED]

We believe that this change can be accomplished by notification rather than by amendment for the
following reasons:

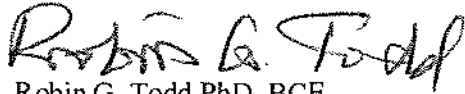
- (i) there will be no change in the certified limit of the permethrin, as the active ingredient
and,
- (ii) the uses approved for the [REDACTED] include application to fabric for protection
against mosquitoes ticks and crawling insects (such as bed bugs).

If you have any questions, please feel free to call me at 410-747-4500 or by email at RTodd@icrlab.com.

In my absence, please ask for Ms. Ellen Quinn at the same number or contact her at EQuinn@icrlab.com.

I thank you in advance for your assistance.

Yours sincerely,



Robin G. Todd PhD. BCE.
Agent & Technical Advisor

Encl.

cc: G. Innocenti
Wm. Ball
J. Erdheim



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83122-1	2. EPA Product Manager Richard J. Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PRO-TEK 50 Fabric/ Apparel (Garment) Treatment	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Garnik Industries, LLC 219 Scott St; #182 Beaufort, SC 29902-5554 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. NOTIFICATION Product Name JUL 19 2011	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formulation of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

Addition of second alternate source of permethrin.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled				<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)			
Name Robin G. Todd, PhD, BCE		Title Technical Consultant	
		Telephone No. (Include Area Code) 410-747-4500	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)
2. Signature		3. Title Technical Consultant	
4. Typed Name Robin G. Todd, PhD, BCE		5. Date Jun 16, 2011	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

AUG - 3 2011

Mr. Robin Todd, PhD
Agent for Garnick Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

Dear Dr. Todd:

Subject: Amendment- addition of IPM statement and two bed bugs products and California new language
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submissions dated April 27, May 12, and July 6, 2011

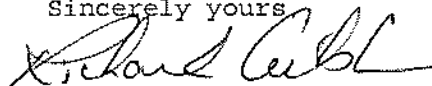
The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. On page 2 start a new bullet "If this product Pro Tek 50 Fabric/Apparel (Garment) Treatment Treated fabric does not fit...Do not dry clean."
2. On page 5 change "DIRECTIONS FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS" to "FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS".
3. On page 6 change "Place items to be protected from bed bugs directly in <storage> [or] <travel bag>." to "Place items to be protected from bed bugs directly in <permethrin treated storage> [or] <permethrin treated travel bag>."
4. On page 7 delete "Use in Integrated Pest Management Program".
5. On page 7 change "This product alone in not intended as a complete solution to bed bug infestations, but for use with other products and methods, as listed on the main label." to "This product alone in not intended as a complete solution to bed bug infestations, but for use with other products and methods, such as those listed on the main label."

A stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours

A handwritten signature in dark ink, appearing to read "Richard Gebken", written over the typed name.

Richard Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7504P)

Enclosure

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

EPA Reg. No. 83122-1

{Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS). The following statements are product descriptors describing each sub-label and are not required language for product labels.}

EIGHT TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS**1. Bed Band**

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band available in appropriate width for mattress thickness). Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated flat, bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Treated two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip pouch closed, or secure bottom edge of protector with stitched gathered elastic. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. If no box spring, use under mattress pad that does not have bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours.

6. Under Furniture Fabric

Place or secure under furniture fabric decking underneath item of furniture, or underneath upholstery cover and secure. Kills bed bugs that remain in contact with treated under furniture fabric for at least 24 hours.

7. Storage or Travel Bag

Items to be protected from bed bugs are placed in storage and travel bag. Kills bed bugs that remain in contact with treated storage or travel bag for at least 24 hours.

8. Fitted Under Mattress Pad

Fitted under mattress pad is attached to the underside of the mattress covering bottom and sides. It is secured by gathered elastic on all four corners. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated fitted under mattress pad for at least 24 hours.

ACCEPTED
COMMENTS
EPA Letter Dated

AUG - 3 2011

Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 83122-1

{The following bullets are optional product claims}

- ◆ Kills bed bugs that <live> <remain><stay> in contact with [treated]< this product><bed band><dust ruffle><headboard backing><box spring protector><under mattress pad><under furniture fabric/decking><storage or travel bag><fitted under mattress pad><~~bandana~~> for at least 24 hours. <Treated fabric><This product> <has no odor> <is odorless>. <Pro-Tek 50 Fabric/Apparel (Garment) Treatment><This product> is washable up to 20 times. If <This product><Pro-Tek 50 Fabric/Apparel (Garment) Treatment><Treated fabric> does not fit in standard washer wipe then clean with damp cloth or sponge or have it professionally washed. Do not dry clean.
- ◆ Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- ◆ "New" { for allowable time frame }
- ◆ Kills bed bugs that <live> <remain><stay> <hide> in contact with < Pro-Tek 50 Fabric/Apparel (Garment) Treatment ><treated> <bed band> <dust ruffle> <headboard backing> <box spring protector> <under mattress pad> <under furniture pad> <storage or travel bag> <fitted under mattress pad> for at least 24 hours.
- ◆ <Insecticidal> <killing> action remains effective for up to 20 washings.
- ◆ Kills bed bugs that stay in contact with Pro-Tek 50 Fabric/Apparel (Garment) Treatment under furniture fabric for at least 24 hours

{For box spring protector, under mattress pad, fitted under mattress pad, and dust ruffle only:}

- ◆ Kills bed bugs that stay in contact with fabric for at least 24 hours [between your box spring and mattress]–

{The following bullets are optional bed bug facts}

- ◆ Bed bugs come out to feed on human hosts
- ◆ Bed bugs typically feed at night
- ◆ Bed bugs may hide in your headboard and lay eggs
- ◆ Blood taken from humans is the food of bed bugs
- ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ◆ Bed bug colonies may cause offensive odors
- ◆ Female bed bugs can lay over 200 eggs in their lifetime
- ◆ Newly hatched bed bugs begin feeding immediately
- ◆ Bed bugs have a piercing beak

This product alone is not intended as a complete solution to bed bug infestations, but for use with other products and methods for killing or preventing them. A partial list of such products and methods is given below.

- check second hand furniture and bedding for bed bugs before bringing them home
- when travelling, keep luggage up on luggage racks, check hotel beds and head boards for bed bugs

- upon return from travel, unpack and place clothes directly into washer, then dryer
- reduce clutter at home
- heat smaller infested articles to 113° for 1 hour
- freeze smaller articles at 0° F for 4 days
- place interceptor traps under bed legs
- encasements around mattresses and box springs
- wash and dry bedding items (but not Pro-Tek products)
- insecticidal sprays labeled for killing bed bugs

{Insert into package of Apparel/Fabric or hang-tag. Note: May be removed by consumer after purchase.}

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

This <fabric><apparel><garment> has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

{Following claims are for treated fabric, apparel or garments}

<Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.>

<Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.>

{Following two claims are for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers and other non-washable items}

<Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.>

<Repels mosquitoes for 6 months of outdoor exposure to the elements.>

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item in each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat <fabric><apparel><garment> with other permethrin insect repellent products. [For repellency protection of exposed skin, use with insect repellent approved for topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

{Bed Bug Products Only}

Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours. Insecticidal (killing) action remains effective for up to 20 washings, if item fits in washer. If item does not fit in washer, [DO NOT WASH, instead wipe clean with a damp cloth or sponge]

{DIRECTION FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS}***{For Bed Band}***

<Stretch><Position> Bed Band around <sides><edges> of mattress and secure tightly using [the Velcro® or other] closures provided. Band wraps around all four sides of the mattress. Bed band should be placed around <sides><edges> of mattress before bed is made and sheet is placed on mattress. Sheet should cover bed band so that band does not contact person lying on bed.

{For Bedskirt or Dust Ruffle}

Remove mattress. Place [fabric] over top of box spring or foundation so that it entirely covers it, with the <skirt><dust ruffle> draping around all four sides. Replace the mattress on top of the covered box spring or foundation. [The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.]

{For Headboard Backing}

Remove headboard and place on floor, <front side><face> down. Attach [treated] backing to back of headboard by tacking, stapling or with glue. With treated backing towards wall, reattach headboard to bed or hang on wall at head of bed as appropriate.

{For Box Spring Protector}

Place box spring inside <pouch> <cover> so that it is completely enclosed in the treated fabric, then <zip the <pouch> <cover> closed.>< secure bottom edge of <pouch><cover> with stitched gathered elastic.>

{For Under Mattress Pad}

Remove mattress. Place pad on box spring and secure with straps. Replace mattress over box springs. If bed does not have box springs, lay pad directly on foundation, without use of straps provided. Replace mattress on box spring or foundation.

{For Under Furniture Fabric}

Place or secure under furniture fabric under furniture or underneath upholstery cover.

{For Storage or Travel Bag}

Place items to be protected from bed bugs directly in <storage> [or]<travel bag>.

{For Fitted Under Mattress Pad}

Fitted under mattress pad is attached to underside of mattress, covering bottom and sides. Use elastic gathered corners to secure pad to mattress. Place mattress cloth side down on the box spring or bed platform.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

<RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS

<APPAREL> <FABRIC><PRODUCT>.>

<THIS INSERT IS][NOT TO BE REMOVED EXCEPT BY CONSUMER.>]

{Label (small tag) sewn into washable fabric}

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

{For bed bug products}

Kills Bed Bugs that stay in contact
for at least 24 hours.

Insecticidal activity remains

Effective up to 20 washings.

Use in Integrated Pest Management program

{For fabric/apparel/garments}

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges

Repellency remains effective
through 25 washings

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-I
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

**This product alone is not intended
as a complete solution to bed bug infestations,
but for use with other products and
methods, as listed on the main label.**

• **Label for Dog Bandanas**

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

DOG BANDANA

This bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana <covers>< is affixed to> the dog. To protect your dog, a product that provides complete body <protection>< coverage> must be used.

Repellency remains effective for 25 washings or 6 months if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1
EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:	
Permethrin	0.52%
Other Ingredients:	<u>99.48%</u>
Total	100.00%

Manufactured by:
Gamik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

DIRECTIONS FOR USE *{for Pro-Tek 50 Fabric/Apparel (Garment) Treatment dog bandana}*

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Wrap bandana around dog's neck making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana <covers><is affixed to> the dog. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat this bandana with other permethrin insect repellent products.

Wash this bandana separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. [THIS INSERT IS] NOT TO BE REMOVED EXCEPT BY CONSUMER.]

{tag sewn on bandana}

**PRO-TEK 50 Fabric/Apparel
(Garment) Treatment**

Dog Bandana

Do Not Dry Clean

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges.

Repellency remains effective through 25 washings; or
for six months if left unwashed.

----- (fold line) -----

Active Ingredient:

Pennethrin 0.52 %

PA Reg. No. 83122-1

EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to full label for more
information.

Please let us know if we have missed anything.

You advised that review of this label amendment can be completed by the 20th of this month. If this is possible it would be very much appreciated.

Best regards,

Robin

Robin G. Todd PhD, BCE

Agent & Technical consultant for Garnik Industries, LLC

1330 Dillon Heights Avenue

Baltimore, MD 21228-1199

USA

tel. 410-747-4500

fax. 410-747-4928

email RTodd@icrlab.com

TMSWEEP

BOX SPRING PROTECTOR

This fabric has been treated with PRO-TEK 50 Fabric treatment containing the active ingredient Permethrin.

Kills Bed Bugs that remain in contact with the box spring protector for at least 24 hours.
Insecticidal (killing) action remains effective for up to 20 washings.

DO NOT DRY CLEAN as this will remove the active ingredient

	Active Ingredient:	
Permethrin		0.52%
Other Ingredients:		<u>99.48%</u>
Total		100.00%

EPA Reg. No. 83122-1 – 86352
EPA Establishment No. 084098-CHN-001

DIRECTION FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

Do not re-treat with other Permethrin products. The use of fabric treatments will reduce the effectiveness of the product. Wash this product separately from the other fabrics.

Storage and Disposal: Do not contaminate water, food or feed by storage or disposal.
Disposal: Discard in trash. Do not reuse.

Manufactured for:
INNOVATIVE TEXTILE SOLUTIONS, INC.

261 Fifth Avenue
New York, N.Y. 10016

Net Contents: one item each package

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS PRODUCT.
THIS INSERT IS NOT TO BE REMOVED EXCEPT BY CONSUMER]

TM **SWEEP**

BED BAND

This fabric has been treated with PRO-TEK 50 Fabric treatment containing the active ingredient Permethrin.

Kills Bed Bugs that remain in contact with the bed band for at least 24 hours.
Insecticidal (killing) action remains effective for up to 20 washings.

DO NOT DRY CLEAN as this will remove the active ingredient

Active Ingredient:	
Permethrin	0.52%
Other Ingredients:	<u>99.48%</u>
Total	100.00%

EPA Reg. No. 83122-1 – 86352
EPA Establishment No. 084098-CHN-001

DIRECTION FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Stretch bed band around edges of mattress and secure tightly using the Velcro® or other closures
Provided. Make sure that band is not positioned above the top of the mattress to avoid contact
with persons lying on the bed.

Do not re-treat with other Permethrin products. The use of fabric treatments will
reduce the effectiveness of the product. Wash this product separately from the other fabrics.

Storage and Disposal: Do not contaminate water, food or feed by storage or disposal.
Disposal: Discard in trash. Do not reuse.

Manufactured for:
INNOVATIVE TEXTILE SOLUTIONS, INC.
261 Fifth Avenue
New York, N.Y. 10016

Net Contents: one item each package

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS PRODUCT.
THIS INSERT IS NOT TO BE REMOVED EXCEPT BY CONSUMER]



UNDER MATTRESS PAD

This fabric has been treated with PRO-TEK 50 Fabric treatment containing the active ingredient Permethrin.

Kills Bed Bugs that remain in contact with the under mattress pad for at least 24 hours.
Insecticidal (killing) action remains effective for up to 20 washings.

DO NOT DRY CLEAN as this will remove the active ingredient

	Active Ingredient:	
Permethrin		0.52%
Other Ingredients:		<u>99.48%</u>
Total		100.00%

EPA Reg. No. 83122-1 – 86352
EPA Establishment No. 084098-CHN-001

DIRECTION FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Remove mattress. Place pad over top of box spring and secure with straps. If no box spring, lay strapless under mattress pad on foundation surface directly beneath mattress. Replace mattress.

Do not re-treat with other Permethrin products. The use of fabric treatments will reduce the effectiveness of the product. Wash this product separately from the other fabrics.

Storage and Disposal: Do not contaminate water, food or feed by storage or disposal.
Disposal: Discard in trash. Do not reuse.

Manufactured for:
INNOVATIVE TEXTILE SOLUTIONS, INC.
261 Fifth Avenue
New York, N.Y. 10016

Net Contents: one item each package

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS PRODUCT.
THIS INSERT IS NOT TO BE REMOVED EXCEPT BY CONSUMER]

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

EPA Reg. No. 83122-1

{Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS). The following statements are product descriptors describing each sub-label and are not required language for product labels.}

EIGHT TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS**1. Bed Band**

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band available in appropriate width for mattress thickness). Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated flat, bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Treated two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip pouch closed, or secure bottom edge of protector with stitched gathered elastic. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. If no box spring, use under mattress pad that does not have bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours.

6. Under Furniture Fabric

Place or secure under furniture fabric decking underneath item of furniture, or underneath upholstery cover and secure. Kills bed bugs that remain in contact with treated under furniture fabric for at least 24 hours.

7. Storage or Travel Bag

Items to be protected from bed bugs are placed in storage and travel bag. Kills bed bugs that remain in contact with treated storage or travel bag for at least 24 hours.

8. Fitted Under Mattress Pad

Fitted under mattress pad is attached to the underside of the mattress covering bottom and sides. It is secured by gathered elastic on all four corners. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated fitted under mattress pad for at least 24 hours.

{The following bullets are optional product claims}

- ◆ Kills bed bugs that <live> <remain><stay> in contact with [treated]< this product><bed band><dust ruffle><headboard backing><box spring protector><under mattress pad><under furniture fabric/decking><storage or travel bag><fitted under mattress pad><~~bandana~~> for at least 24 hours. <Treated fabric><This product> <has no odor> <is odorless>. <Pro-Tek 50 Fabric/Apparel (Garment) Treatment><This product>is washable up to 20 times. If <This product><Pro-Tek 50 Fabric/Apparel (Garment) Treatment><Treated fabric> does not fit in standard washer wipe then clean with damp cloth or sponge or have it professionally washed. Do not dry clean.
- ◆ Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- ◆ "New" {for allowable time frame}
- ◆ Kills bed bugs that <live> <remain><stay> <hide> in contact with < Pro-Tek 50 Fabric/Apparel (Garment) Treatment ><treated> <bed band> <dust ruffle> <headboard backing> <box spring protector> <under mattress pad> <under furniture pad> <storage or travel bag> <fitted under mattress pad> for at least 24 hours.
- ◆ <Insecticidal> <killing> action remains effective for up to 20 washings.
- ◆ Kills bed bugs that stay in contact with Pro-Tek 50 Fabric/Apparel (Garment) Treatment under furniture fabric for at least 24 hours

{For box spring protector, under mattress pad, fitted under mattress pad, and dust ruffle only:}

- ◆ Kills bed bugs that stay in contact with fabric for at least 24 hours [between your box spring and mattress]—

{The following bullets are optional bed bug facts}

- ◆ Bed bugs come out to feed on human hosts
- ◆ Bed bugs typically feed at night
- ◆ Bed bugs may hide in your headboard and lay eggs
- ◆ Blood taken from humans is the food of bed bugs
- ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ◆ Bed bug colonies may cause offensive odors
- ◆ Female bed bugs can lay over 200 eggs in their lifetime
- ◆ Newly hatched bed bugs begin feeding immediately
- ◆ Bed bugs have a piercing beak

This product alone is not intended as a complete solution to bed bug infestations, but for use with other products and methods for killing or preventing them. A partial list of such products and methods is given below.

- check second hand furniture and bedding for bed bugs before bringing them home
- when travelling, keep luggage up on luggage racks, check hotel beds and head boards for bed bugs

- upon return from travel, unpack and place clothes directly into washer, then dryer
- reduce clutter at home
- heat smaller infested articles to 113° for 1 hour
- freeze smaller articles at 0° F for 4 days
- place interceptor traps under bed legs
- encasements around mattresses and box springs
- wash and dry bedding items (but not Pro-Tek products)
- insecticidal sprays labeled for killing bed bugs

{Insert into package of Apparel/Fabric or hang-tag. Note: May be removed by consumer after purchase.}

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

This <fabric><apparel><garment> has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

{Following claims are for treated fabric, apparel or garments}

<Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.>

<Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.>

{Following two claims are for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers and other non-washable items}

<Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.>

<Repels mosquitoes for 6 months of outdoor exposure to the elements.>

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item in each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat <fabric><apparel><garment> with other permethrin insect repellent products. [For repellency protection of exposed skin, use with insect repellent approved for topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

{Bed Bug Products Only}

Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours. Insecticidal (killing) action remains effective for up to 20 washings, if item fits in washer. If item does not fit in washer, [DO NOT WASH, instead wipe clean with a damp cloth or sponge]

{DIRECTION FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS}***{For Bed Band}***

<Stretch><Position> Bed Band around <sides><edges> of mattress and secure tightly using [the Velcro® or other] closures provided. Band wraps around all four sides of the mattress. Bed band should be placed around <sides><edges> of mattress before bed is made and sheet is placed on mattress. Sheet should cover bed band so that band does not contact person lying on bed.

{For Bedskirt or Dust Ruffle}

Remove mattress. Place [fabric] over top of box spring or foundation so that it entirely covers it, with the <skirt><dust ruffle> draping around all four sides. Replace the mattress on top of the covered box spring or foundation. [The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.]

{For Headboard Backing}

Remove headboard and place on floor, <front side><face> down. Attach [treated] backing to back of headboard by tacking, stapling or with glue. With treated backing towards wall, reattach headboard to bed or hang on wall at head of bed as appropriate.

{For Box Spring Protector}

Place box spring inside <pouch> <cover> so that it is completely enclosed in the treated fabric, then <zip the <pouch> <cover> closed.>< secure bottom edge of <pouch><cover> with stitched gathered elastic.>

{For Under Mattress Pad}

Remove mattress. Place pad on box spring and secure with straps. Replace mattress over box springs. If bed does not have box springs, lay pad directly on foundation, without use of straps provided. Replace mattress on box spring or foundation.

{For Under Furniture Fabric}

Place or secure under furniture fabric under furniture or underneath upholstery cover.

{For Storage or Travel Bag}

Place items to be protected from bed bugs directly in <storage> [or] <travel bag>.

{For Fitted Under Mattress Pad}

Fitted under mattress pad is attached to underside of mattress, covering bottom and sides. Use elastic gathered corners to secure pad to mattress. Place mattress cloth side down on the box spring or bed platform.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

<RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS

<APPAREL> <FABRIC><PRODUCT>.>

<THIS INSERT IS][NOT TO BE REMOVED EXCEPT BY CONSUMER.>]

{Label (small tag) sewn into washable fabric}

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

{For bed bug products}

Kills Bed Bugs that stay in contact
for at least 24 hours.

Insecticidal activity remains

Effective up to 20 washings.

Use in Integrated Pest Management program

{For fabric/apparel/garments}

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges

Repellency remains effective
through 25 washings

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

***This product alone is not intended
as a complete solution to bed bug infestations,
but for use with other products and
methods, as listed on the main label.***

- **Label for Dog Bandanas**

PRO-TEK 50 Fabric/Apparel (Garment) Treatment**DOG BANDANA**

This bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50 Fabric/Apparel (Garment)** Treatment that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana <covers>< <is affixed to> the dog. To protect your dog, a product that provides complete body <protection><coverage> must be used.

Repellency remains effective for 25 washings or 6 months if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1 .

EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:

Permethrin 0.52%

Other Ingredients: 99.48%

Total 100.00%

Manufactured by:

Gamik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

DIRECTIONS FOR USE *{for Pro-Tek 50 Fabric/Apparel (Garment) Treatment dog bandana}*

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Wrap bandana around dog's neck making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana <covers><is affixed to> the dog. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat this bandana with other permethrin insect repellent products.

Wash this bandana separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. [THIS INSERT IS] NOT TO BE REMOVED EXCEPT BY CONSUMER.]

{tag sewn on bandana}

**PRO-TEK 50 Fabric/Apparel
(Garment) Treatment**

Dog Bandana

Do Not Dry Clean

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges.

Repellency remains effective through 25 washings; or
for six months if left unwashed.

----- (fold line) -----

Active Ingredient:

Pennethrin 0.52 %

PA Reg. No. 83122-1

EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to full label for more
information.

*Garnik Industries, LLC
219 Scott Street # 182
Beaufort, SC 29902-5554*

Please reply to:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228

Telephone # 410-747-4500
Fax # 410-747-4928

May 12, 2011

Richard J. Gebken PM 10
Insecticide Branch, Registration Division
Document Processing Desk (7504C)
Office of Pesticide Programs
U. S. ENVIRONMENTAL PROTECTION AGENCY
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Attention: Linda DeLuise

SUBJECT: PRO-TEK 50 Fabric/Apparel (Garment) Treatment; EPA Reg. No. 83122-1
Label Amendment ~ addition of IPM statement & two bed bug products
NEW language added to label (Cal DPR request and clarity) for review
Follow from our May 11th phone discussion: request for Fast Track

Dear Mr. Gebken and Ms. DeLuise:

Thank you very much for your phone call yesterday regarding the application to amend the Pro-Tek label. You raised a number of questions about the label which need to be addressed. I outline these below.

1. State Labels

Innovative Textile Solutions, in agreement with Garnik Industries, LLC, will market Pro-Tek products for protection against bed bugs under the brand name TMSweep. As requested we attach copies of the labels of the three main Sweep products that are registered in all 48 states, and are what the user will actually receive with the products.

TMSWEEP

BOX SPRING PROTECTOR

This fabric has been treated with PRO-TEK 50 Fabric treatment containing the active ingredient Permethrin.

Kills Bed Bugs that remain in contact with the box spring protector for at least 24 hours.
Insecticidal (killing) action remains effective for up to 20 washings.

DO NOT DRY CLEAN as this will remove the active ingredient

	Active Ingredient:	
Permethrin		0.52%
Other Ingredients:		<u>99.48%</u>
Total		100.00%

EPA Reg. No. 83122-1 – 86352
EPA Establishment No. 084098-CHN-001

DIRECTION FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

Do not re-treat with other Permethrin products. The use of fabric treatments will reduce the effectiveness of the product. Wash this product separately from the other fabrics.

Storage and Disposal: Do not contaminate water, food or feed by storage or disposal.
Disposal: Discard in trash. Do not reuse.

Manufactured for:
INNOVATIVE TEXTILE SOLUTIONS, INC.
261 Fifth Avenue
New York, N.Y. 10016

Net Contents: one item each package

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS PRODUCT.
THIS INSERT IS NOT TO BE REMOVED EXCEPT BY CONSUMER]

TMSWEEP

BED BAND

This fabric has been treated with PRO-TEK 50 Fabric treatment containing the active ingredient Permethrin.

Kills Bed Bugs that remain in contact with the bed band for at least 24 hours.
Insecticidal (killing) action remains effective for up to 20 washings.

DO NOT DRY CLEAN as this will remove the active ingredient

	Active Ingredient:	
Permethrin		0.52%
Other Ingredients:		<u>99.48%</u>
Total		100.00%

EPA Reg. No. 83122-1 – 86352
EPA Establishment No. 084098-CHN-001

DIRECTION FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Stretch bed band around edges of mattress and secure tightly using the Velcro® or other closures Provided. Make sure that band is not positioned above the top of the mattress to avoid contact with persons lying on the bed.

Do not re-treat with other Permethrin products. The use of fabric treatments will reduce the effectiveness of the product. Wash this product separately from the other fabrics.

Storage and Disposal: Do not contaminate water, food or feed by storage or disposal.
Disposal: Discard in trash. Do not reuse.

Manufactured for:
INNOVATIVE TEXTILE SOLUTIONS, INC.
261 Fifth Avenue
New York, N.Y 10016

Net Contents: one item each package

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS PRODUCT.
THIS INSERT IS NOT TO BE REMOVED EXCEPT BY CONSUMER]



UNDER MATTRESS PAD

This fabric has been treated with PRO-TEK 50 Fabric treatment containing the active ingredient Permethrin.

Kills Bed Bugs that remain in contact with the under mattress pad for at least 24 hours.
Insecticidal (killing) action remains effective for up to 20 washings.

DO NOT DRY CLEAN as this will remove the active ingredient

Active Ingredient:	
Permethrin	0.52%
Other Ingredients:	<u>99.48%</u>
Total	100.00%

EPA Reg. No. 83122-1 – 86352
EPA Establishment No. 084098-CHN-001

DIRECTION FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Remove mattress. Place pad over top of box spring and secure with straps. If no box spring, lay strapless under mattress pad on foundation surface directly beneath mattress. Replace mattress.

Do not re-treat with other Permethrin products. The use of fabric treatments will reduce the effectiveness of the product. Wash this product separately from the other fabrics.

Storage and Disposal: Do not contaminate water, food or feed by storage or disposal.
Disposal: Discard in trash. Do not reuse.

Manufactured for:
INNOVATIVE TEXTILE SOLUTIONS, INC.
261 Fifth Avenue
New York, N.Y. 10016

Net Contents: one item each package

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS PRODUCT.
THIS INSERT IS NOT TO BE REMOVED EXCEPT BY CONSUMER]

Garnik Industries, LLC
219 Scott Street # 182
Beaufort, SC 29902-5554

Please reply to:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228

Telephone # 410-747-4500
Fax # 410-747-4928

Date April 27, 2011

Richard J. Gebken PM 10
Ms. Linda Deluise
Insecticide Branch, Registration Division
Document Processing Desk (7504C)
Office of Pesticide Programs
U. S. ENVIRONMENTAL PROTECTION AGENCY
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

SUBJECT: PRO-TEK 50 Fabric/Apparel (Garment) Treatment; EPA Reg. No. 83122-1
Label Amendment – addition of IPM statement & two bed bug products
NEW language added to label (Cal DPR request and clarity) for review

Dear Mr. Gebken and Ms. Deluise:

As discussed on the telephone with Ms. Linda Deluise, after we submitted our March 15, 2011 application to amend this registration to add an IPM statement and two new bed bug products, California's DPR reviewers requested that we further amend the label for clarity and more direct language. On behalf of Garnik Industries, LLC, we complied with their request and enclose the newly revised label with the following new language for this label highlighted in yellow:

1. The added IPM statements
2. The two new bed products
3. The clarity changes to the previously submitted label, all highlighted in yellow.

We appreciate your cooperation with this matter, and please do not hesitate to contact either Ms. Ellen Quinn or me at email addresses equinn@icrlab.com or rtodd@icrlab.com (telephone number 410-747-4500) if you have any questions.

Arthur G. Tiedel

Cc: G. Innocenti, J. Erdheim for Garnik Industries, LLC

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

EPA Reg. No. 83122-1

{Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS). The following statements are product descriptors describing each sub-label and are not required language for product labels.}

EIGHT TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS	
1. Bed Band	Band of hemmed, treated fabric which wraps around all four sides of a mattress (band available in appropriate width for mattress thickness). Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.
2. Bedskirt or Dust Ruffle	Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated flat, bedskirt or dust ruffle for at least 24 hours.
3. Headboard Backing	Treated two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.
4. Box Spring Protector	Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip pouch closed, or secure bottom edge of protector with stitched gathered elastic. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.
5. Under Mattress Pad	Place under mattress pad between mattress and box spring and secure with elastic bands. If no box spring, use under mattress pad that does not have bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours.
6. Under Furniture Fabric	Place or secure under furniture fabric decking underneath item of furniture, or underneath upholstery cover and secure. Kills bed bugs that remain in contact with treated under furniture fabric for at least 24 hours.
7. Storage or Travel Bag	Items to be protected from bed bugs are placed in storage and travel bag. Kills bed bugs that remain in contact with treated storage or travel bag for at least 24 hours.
8. Fitted Under Mattress Pad	Fitted under mattress pad is attached to the underside of the mattress covering bottom and sides. It is secured by

gathered elastic on all four corners. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated fitted under mattress pad for at least 24 hours.
--

{The following bullets are optional product claims}

- Kills bed bugs that <live> <remain><stay> in contact with [treated]< this product><bed band><dust ruffle><headboard backing><box spring protector><under mattress pad><under furniture fabric/decking>

Brackets: () Notes to reviewer. [] Optional language. < > Alternate Words.

storage or travel bag><fitted under mattress pad><bandana>for at least 24 hours.<Treated fabric><This product> <has no odor> <is odorless>. <Pro-Tek 50 Fabric/Apparel (Garment) Treatment><This product> washable up to 20 times If <This product><Pro-Tek 50 Fabric/Apparel (Garment) Treatment><Treated fabric> does not fit in standard washer wipe then clean with damp cloth or sponge or have it professionally washed. Do not dry clean.

- Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
 - "New" {for allowable time frame}
 - Kills bed bugs that <live> <remain><stay> <hide> in contact with <Pro-Tek 50 Fabric/Apparel (Garment) Treatment><treated> <bed band> <dust ruffle> <headboard backing> <box spring protector> <under mattress pad> <under furniture pad> <storage or travel bag> <fitted under mattress pad> for at least 24 hours.
 - <Insecticidal> <killing> action remains effective for up to 20 washings.
 - Kills bed bugs that stay in contact with Pro-Tek 50 Fabric/Apparel (Garment) Treatment under furniture fabric for at least 24 hours
- {For box spring protector, under mattress pad, fitted under mattress pad, and dust ruffle only:}
- Kills bed bugs that stay in contact with fabric for at least 24 hours [between your box spring and mattress]–

{The following bullets are optional bed bug facts}

- Bed bugs come out to feed on human hosts
- Bed bugs typically feed at night
- Bed bugs may hide in your headboard and lay eggs
- Blood taken from humans is the food of bed bugs
- Bed bug bites may cause welts which become irritated, inflamed and itchy
- Bed bug colonies may cause offensive odors
- Female bed bugs can lay over 200 eggs in their lifetime
- Newly hatched bed bugs begin feeding immediately
- Bed bugs have a piercing beak

This product alone is not intended as a complete solution to bed bug infestations, but for use with other products and methods for killing or preventing them. A partial list of such products and methods is given below.

- check second hand furniture and bedding for bed bugs before bringing them home
- when travelling, keep luggage up on luggage racks, check hotel beds and head boards for bed bugs
- upon return from travel, unpack and place clothes directly into washer, then dryer
- reduce clutter at home
- heat smaller infested articles to 113⁰ for 1 hour
- freeze smaller articles at 0⁰F for 4 days
- place interceptor traps under bed legs
- encasements around mattresses and box springs
- wash and dry bedding items (but not Pro-Tek products)
- insecticidal sprays labeled for killing bed bugs

{Insert into package of Apparel/Fabric or hang-tag. Note: May be removed by consumer after purchase.}

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

This <fabric><apparel><garment> has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

{Following claims are for treated fabric, apparel or garments}

<Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.>

<Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.>

{Following two claims are for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers and other non-washable items}

<Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.>

<Repels mosquitoes for 6 months of outdoor exposure to the elements.>

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin	0.52 %
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Other Ingredients:	<u>99.48 %</u>
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Total	100.00 %
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Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item in each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat <fabric><apparel><garment> with other permethrin insect repellent products.
[For repellency protection of exposed skin, use with insect repellent approved for topical (direct) application to skin]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

{Bed Bug Products Only}

Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours.
Insecticidal (killing) action remains effective for up to 20 washings, if item fits in washer.
If item does not fit in washer, [DO NOT WASH, instead wipe clean with a damp cloth or sponge]

{DIRECTION FOR USE FOR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS}

{For Bed Band}

<Stretch><Position> Bed Band around <sides><edges> of mattress and secure tightly using [the Velcro® or other] closures provided. Band wraps around all four sides of the mattress. Bed band should be placed around <sides><edges> of mattress before bed is made and sheet is placed on mattress. Sheet should cover bed band so that band does not contact person lying on bed.

{For Bedskirt or Dust Ruffle}

Remove mattress. Place [fabric] over top of box spring or foundation so that it entirely covers it, with the <skirt><dust ruffle> draping around all four sides. Replace the mattress on top of the covered box spring or foundation. [The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.]

{For Headboard Backing}

Remove headboard and place on floor, <front side><face> down. Attach [treated] backing to back of headboard by tacking, stapling or with glue. With treated backing towards wall, reattach headboard to bed or hang on wall at head of bed as appropriate.

{For Box Spring Protector}

Place box spring inside <pouch> <cover> so that it is completely enclosed in the treated fabric, then <zip the <pouch> <cover> closed.>< secure bottom edge of <pouch><cover> with stitched gathered elastic.>

{For Under Mattress Pad}

Remove mattress. Place pad on box spring and secure with straps. Replace mattress over box springs. If bed does not have box springs, lay pad directly on foundation, without use of straps provided. Replace mattress on box spring or foundation.

{For Under Furniture Fabric}

Place or secure under furniture fabric under furniture or underneath upholstery cover.

{For Storage or Travel Bag}

Place items to be protected from bed bugs directly in <storage> [or]<travel bag>.

{For Fitted Under Mattress Pad}

Fitted under mattress pad is attached to underside of mattress, covering bottom and sides. Use elastic gathered corners to secure pad to mattress. Place mattress cloth side down on the box spring or bed platform.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

<RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS
<APPAREL> <FABRIC><PRODUCT>>
<THIS INSERT IS][NOT TO BE REMOVED EXCEPT BY CONSUMER.>]

{Label (small tag) sewn into washable fabric}

PRO-TEK 50
Fabric/Apparel (Garment)
Treatment

Do Not Dry Clean

{For bed bug products}

Kills Bed Bugs that stay in contact
for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings.
Use in Integrated Pest Management program

{For fabric/apparel/garments}

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges

Repellency remains effective
through 25 washings

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

This product alone is not intended
as a complete solution to bed bug infestations,
but for use with other products and
methods, as listed on the main label.

• **Label for Dog Bandanas**

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

DOG BANDANA

This bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana <covers>< <is affixed to> the dog. To protect your dog, a product that provides complete body <protection><coverage> must be used.

Repellency remains effective for 25 washings or 6 months if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1 .

EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:

Permethrin 0.52%

Other Ingredients: 99.48%

Total 100.00%

Manufactured by:

Gamik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

DIRECTIONS FOR USE *{for Pro-Tek 50 Fabric/Apparel (Garment) Treatment dog bandana}*

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Wrap bandana around dog's neck making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana <covers><is affixed to> the dog. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat this bandana with other permethrin insect repellent products.

Wash this bandana separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. [THIS INSERT IS] NOT TO BE REMOVED EXCEPT BY CONSUMER.]

{tag sewn on bandana}

**PRO-TEK 50 Fabric/Apparel
(Garment) Treatment**

Dog Bandana

Do Not Dry Clean

Repels Mosquitoes, Ticks,
Flies, Chiggers, and Midges.

Repellency remains effective through 25 washings; or
for six months if left unwashed.

----- (fold line) -----

Active Ingredient:

Pennethrin 0.52 %

PA Reg. No. 83122-1

EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to full label for more
information.

21-Day Screen of Amendment
(Completed by Contractor)

21-day Expires on 4-8-11

Document Part Of: 83122-1
MRID, If Any: _____

Content Screen: Recommended to
Pass/Fail

86-5 Review: Passed/Failed/**NA**

Overall Status: **Pass/Fail**

Document returned to:

STEPHEN SETHAIBLE
PM-10

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 3-18-11

Experts In-Processing Signature: M F Himmelman Date 3-18-11 Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>83122-1</u>		EPA Receipt Date: <u>3-18-11</u>				
Items for Review				Yes	No	N/A*
1	Application Form (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)					X
	a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A)	yes	no			
3	Certification with Respect to Citation of Data (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)					X
	Certificate and data matrix consistent					X
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	yes	no			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	Formulator's Exemption Statement (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
5	Data Matrix (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)					X
	a) Selective Method (Fee category experts use)	yes	no			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels)			X		

7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)			X
8	Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)			X
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)			X
10	Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

No studies associated with this amendment.

86-5 Review - N/A

Amendment - Passed

J.S. / 03-23-11

MRID - N/A

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses even if a product is currently registered by consulting the inert Web

site [link to <http://www.epa.gov/opprd001/inerts/lists.html>] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbnpd/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <http://www.epa.gov/opprd001/inerts/tips.pdf>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 18, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT
OR PAY ON-LINE at www.Pay.Gov (See Below for Details)

OPP Decision Number: D-446633
EPA File Symbol or Registration Number: 83122-1
Product Name: PRO-TEK 50 FABRIC/APPAREL (GARMENT) TREATMENT
EPA Receipt Date: 18-Mar-2011
EPA Company Number: 83122
Company Name: GARNIK INDUSTRIES, LLC

ROBIN G. TODD, PH.D.
ICR, INC.
GARNIK INDUSTRIES, LLC
1330 DILLON HEIGHTS AVENUE
BALTIMORE, MD 21228-1199

SUBJECT: Receipt of Amendment Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application for Amendment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R340

NON-FAST-TRACK (INCLUDES CHANGES TO PRECAUTIONARY LABEL
STATEMENTS; SOURCE CHANGES TO AN UNREGISTERED SOURCE);

Please remit payment in the amount of: \$450 (\$3,617 fee minus \$3,167 previously paid) to:

By USPS:
USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 979074
St. Louis, MO 63197

By Courier:

U.S. Bank
Government Lockbox 979074
1005 Convention Plaza
SL-MO-C2-GL
St. Louis, MO 63197
Telephone: (314) 418-4990

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

Effective November 1, 2006, fees may be paid on-line via credit card or electronic fund transfer. To submit a payment on-line, visit www.pay.gov. From the pay.gov home page, select "search by form name." From the next page, select "P," then click on "Pesticide Registration Improvement Act. Fee Payment" and complete the form, making certain to use the decision number and registration number on the invoice you receive from the Pesticide Program in the space provided.

You may be eligible for a partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW
Washington, DC 20460

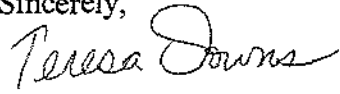
By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900 Potomac Yard
2777 S. Crystal Dr.
Arlington, VA

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 14 days, the Agency will presume that you no longer want to pursue this action. The Agency will then reject your application and issue an invoice for any applicable outstanding fees.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman,
at (703) 308-9362.

Sincerely,

A handwritten signature in cursive script that reads "Teresa Downs".

Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

{892299_~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 10

Receipt No.

S- 892299

EPA File Symbol/Reg. No.

83122-1

Pin-Punch Date:

3/18/2011

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R340

Granted: R340

Amount Due: \$ 3617⁰⁰

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *[Signature]*

Date: 3/18/11

Remarks:

Online Payment

Step 3: Confirm Payment

1 | 2 | 3

Thank you.

Your transaction has been successfully completed.

Pay.gov Tracking Information

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 252S2D78

Agency Tracking ID: 74184733929

Transaction Date and Time: 03/17/2011 13:49 EDT

Payment Summary

Account Holder Insect Control & Research,
Name: Inc.

Payment Amount: \$3,167.00

Account Type: Business Checking

Routing Number: [REDACTED]

Account Number: *****8536

Payment Date: 03/18/2011

Decision Number:

Registration Number: 83122-1

Company Name: Garnik Industries, LLC

Company Number: 83122

Action Code: R340

*Prepaid application
fee*

Commercial/financial information may be entitled to confidential treatment

185

2/17/2011



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83122-1	2. EPA Product Manager R. Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Pro-Tek 50 Fabric/Apoarel (Garment) Treatment	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Garnik Industries, LLC 219 Scott Street # 182 Beaufort SC 29907 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Garnik wants to add two new bed bug products to the existing label, and some additional language regarding Integrated Pest Management to the label.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input checked="" type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	<input type="checkbox"/> Other (Specify) _____
3. Location of Not Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1 item / pkg		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other inserted _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Ellen Quinn	Title Regulatory Consultant	Telephone No. (Include Area Code) 410-747-4500
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		9. Date Application Received (Stamped)
2. Signature 	3. Title Technical Consultant and agent	
4. Typed Name Robin G. Todd, PhD	5. Date Mar 16, 2011	

Garnik Industries, LLC
219 Scott Street # 182
Beaufort, SC 29902-5554

Please reply to:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228

Telephone # 410-747-4500
Fax # 410-747-4928

Date March 15, 2011

Richard J. Gebken PM 10
Insecticide Branch, Registration Division
Document Processing Desk (7504C)
Office of Pesticide Programs
U. S. ENVIRONMENTAL PROTECTION AGENCY
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

SUBJECT: PRO-TEK 50 Fabric/Apparel (Garment) Treatment
EPA Reg. No. 83122-1
Label Amendment – addition of IPM statement & two bed bug products

Dear Mr. Gebken:

Please find attached our application to amend the label for PRO-TEK 50 Fabric/Apparel (Garment) Treatment ('Pro-Tek') (EPA Reg. No. 83122-1). We wish to make the following additions:

1. Add the following two bed bug killing fabric products:
 - a. Storage or Travel Bag
 - b. Fitted Under Mattress Pad
2. Include a statement advising the user that fabric products treated with Pro-Tek need to be used in concert with other products and control measures to achieve bed bug control by an integrated pest management approach. The user is directed to the EPA bed bug website for further guidance.

We are submitting the following documents in support of this application:

1. EPA form 8570-1, completed for a label amendment
2. Draft of amended label with changes highlighted (5 copies)

3. Current label
4. Receipt for electronic payment of PRIA II fee (\$3,167, R340)

If you have any questions, please do not hesitate to contact me (RTodd@icrlab.com) or Ellen Quinn (EQuinn@icrlab.com); we can both be reached at 410-747-4500.

Yours sincerely,



Robin G. Todd PhD. BCE.
Technical Consultant & Agent for Garnik Industries, LLC

Encl.

cc: G. Innocenti w/encl
J. Erdheim w/encl

*Module
of Bed Bug
prevention*

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

EIGHT TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band available in appropriate width for mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Treated two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip pouch closed, or secure bottom edge of protector with stitched gathered elastic. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. If no box spring, use under mattress pad that does not have bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours.

6. Under Furniture Fabric

Place or secure under furniture fabric decking underneath item of furniture, or underneath upholstery cover and secure. Kills bed bugs that remain in contact with treated under furniture fabric for at least 24 hours.

7. Storage or Travel Bag

Items to be protected from bed bugs are placed in storage and travel bag. Kills bed bugs that remain in contact with treated storage or travel bag for at least 24 hours.

8. Fitted Under Mattress Pad

Fitted under mattress pad is attached to the underside of the mattress covering bottom and sides. It is secured by gathered elastic on all four corners. Sewn to the bottom may be a skirt which hangs from sides to the floor. Kills bed bugs that remain in contact with treated fitted under mattress pad for at least 24 hours.

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50**

Fabric/Apparel (Garment) Treatment that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours

Insecticidal (killing) action remains effective for up to 20 washings, if item fits in washer.]

If item does not fit in washer, [DO NOT WASH, instead wipe clean with a damp cloth or sponge]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

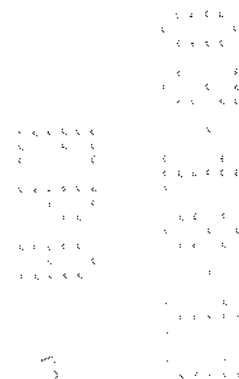
219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item in each package

- ◆ Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector][under mattress pad] [under furniture fabric/decking] [storage or travel bag] [fitted under mattress pad] for at least 24 hours.
- ◆ Bed bugs come out to feed on human hosts
- ◆ Bed bugs typically feed at night
- ◆ Bed bugs may hide in your headboard and lay eggs
- ◆ Blood taken from humans is the food of bed bugs
- ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ◆ Bed bug colonies may cause offensive odors
- ◆ Female bed bugs can lay over 200 eggs in their lifetime
- ◆ Newly hatched bed bugs begin feeding immediately
- ◆ Bed bugs have a piercing beak
- ◆ Treated fabric [has no odor] [is washable up to 20 times if item fits in washer [bed band] [dust ruffle] [headboard backing] [box spring protector][under mattress pad] [under furniture fabric/decking] [storage or travel bag] [fitted under mattress pad]]
- ◆ Treated fabric [has no odor] [DO NOT WASH if item does not fit in washer [bed band] [dust ruffle] [headboard backing] [box spring protector][under mattress pad] [under furniture pad/decking] [storage or travel bag] [fitted under mattress pad]; instead wipe clean with damp cloth or sponge]
- ◆ Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- ◆ “New” (for allowable time frame)
- ◆ Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] [under mattress pad] [under furniture pad] [storage or travel bag] [fitted under mattress pad] for at least 24 hours. Insecticidal (killing) action remains effective for up to 20 washings.
- ◆ Kills bed bugs that stay in contact with fabric for at least 24 hours between your box spring and mattress for at least 24 hours – *(for box spring protector, under mattress pad, fitted under mattress pad, and dust ruffle only)*
- ◆ Kills bed bugs that stay in contact with under furniture fabric for at least 24 hours

These products alone are not intended as a complete solution to bed bug infestations, but for use as part of an integrated pest management (“IPM”) program. Information offered by the Environmental Protection Agency on IPM programs for bed bugs is available at <http://www.epa.gov/pesticides/bedbugs/#treat>.



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

EIGHT TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON, AROUND & NEAR BEDS

1. Bed Band

Stretch bed band around edges of mattress and secure tightly using the Velcro or other closures provided. Band of hemmed, treated fabric wraps around all four sides of a mattress. Make sure that band is not positioned above the top of the mattress to avoid contact to person lying on bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place fabric over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.

4. Box Spring Protector

Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

5. Under Mattress Pad

Place pad between mattress and box spring and secure with straps. If no box spring lay strapless under mattress pad on surface directly beneath mattress.

6. Under Furniture Fabric

Place or secure under furniture fabric under furniture or underneath upholstery cover.

7. Storage or Travel Bag

Items to be protected from bed bugs are placed in storage or travel bag.

8. Fitted Under Mattress Pad

Fitted under mattress pad is attached to underside of mattress, covering bottom and sides. It is

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]

The diagram illustrates the relationship between the number of nodes (N) and the number of edges (E) in a network. It shows a grid of nodes (circles) and edges (lines). The nodes are arranged in a grid, and the edges connect them. The number of nodes (N) is shown as a function of the number of edges (E). The diagram illustrates that for a given number of nodes, there is a range of possible edge counts, and for a given number of edges, there is a range of possible node counts. The diagram is labeled with ' N ' and ' E '.

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs that stay in contact for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings]
Use in Integrated Pest Management programs

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-I
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

These products alone are not intended
as a complete solution to bed bug infestations,
but for use as part of an integrated pest management
("IPM") program. Information offered by the US EPA
on IPM programs for bed bugs is available at
<http://www.epa.gov/pesticides/bedbugs/#treat>.

Label for Dog Bandanas
Master Label Pro-Tek 50 Fabric (including Dog Bandana)

PRO-TEK 50 DOG BANDANA

The **PRO-TEK 50** Bandana is for use on dogs **ONLY** and has been treated with **PRO-TEK 50** that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana covers [is affixed to] the dog [pet]. To protect your dog, a product that provides complete body protection must be used.

Repellency remains effective for 25 washings.

Repellency to mosquitoes remains effective for 6 months of exposure to weathering if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1 .
EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:	
Permethrin	0.52%
Other Ingredients:	<u>99.48%</u>
Total	100.00%

Manufactured by:
Gamik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

DIRECTIONS FOR USE

It is a violation of federal law to use this product in a manner inconsistent with its labeling.

Wrap bandana around dog's neck, making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana covers [is affixed to] the dog *[pet]*. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat Pro-Tek 50 Dog Bandanas with other permethrin insect repellent products.

Wash ProTek 50 Dog Bandanas separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC. NOT TO BE REMOVED EXCEPT BY CONSUMER.]

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Robin Todd, PhD
Agent for Garnick Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

JUN - 1 2010

Dear Dr. Todd:

Subject: Label amendment- clarify Directions for Use
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submission dated April 27, 2010

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable.

A copy of a stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Richard A. Gebken".

Richard Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7505P)

Enclosure

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

SIX TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON & AROUND BEDS

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

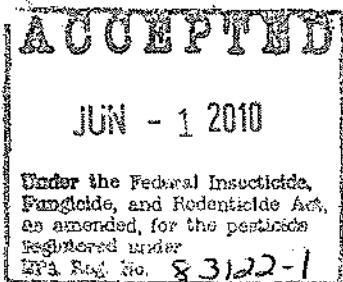
Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

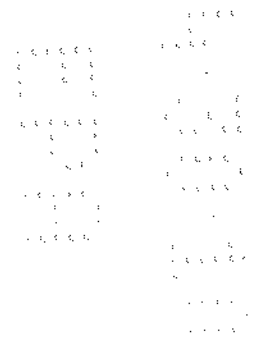
Place under mattress pad between mattress and box spring and secure with elastic bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours. If no box spring, use under mattress pad that does not have bands.

6. Under Furniture Pad

Place under furniture pad underneath item of furniture and secure. Kills bed bugs that remain in contact with treated under furniture pad for at least 24 hours.



- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] [under mattress pad] [under furniture pad] for at least 24 hours
- Bed bugs come out to feed on human hosts
- Bed bugs typically feed at night
- Bed bugs may hide in your headboard and lay eggs
- Blood taken from humans is the food of bed bugs
- Bed bug bites may cause welts which become irritated, inflamed and itchy
- Bed bug colonies may cause offensive odors
- Female bed bugs can lay over 200 eggs in their lifetime
- Newly hatched bed bugs begin feeding immediately
- Bed bugs have a piercing beak
- Treated fabric has no odor and is washable up to 20 times
- Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- "New" (for allowable time frame)
- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] for at least 24 hours.
- Insecticidal (killing) action remains effective for up to 20 washings.
- Kills bed bugs that stay in contact with fabric for at least 24 hours between your box spring and mattress, or under mattress if no box spring – (for box spring protector, under mattress pad and dust ruffle only)
- Kills bed bugs that stay in contact with under furniture pad for at least 24 hours.



Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours
Insecticidal (killing) action remains effective for up to 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Gamik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

1. Bed Band

Stretch bed band around edges of mattress and secured tightly using the Velcro or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact to persons lying on the bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.]

4. Box Spring Protector

Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

5. Under Mattress Pad

Place pad between mattress and box spring and secure with straps. If no box spring lay strapless under mattress pad on surface directly beneath mattress.

6. Under Furniture Pad

Place pad under furniture and secure as directed.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs that
stay in contact for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

———— (fold line) ————

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

Label for Dog Bandanas

NEW

Master Label Pro-Tek 50 Fabric (including Dog Bandana)

PRO-TEK 50 DOG BANDANA

The Pro-Tek 50 Bandana is for use on dogs ONLY and has been treated with **PRO-TEK 50** that contains the active ingredient permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. This product will only repel pests where the bandana covers [is affixed to] the dog [pet]. To protect your dog, a product that provides complete body protection must be used.

Repellency remains effective for 25 washings.

Repellency to mosquitoes remains effective for 6 months of exposure to weathering if not washed.

DO NOT DRY CLEAN

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Net Contents: one item each package

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

NEW

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Wrap bandana around dog's neck, making sure that it is not too tight to cause discomfort or too loose that dog may become caught on something.

This product will only repel pests where the bandana covers [is affixed to] the dog [pet]. To completely protect your pet, another product that provides complete body protection must also be used.

Do not re-treat Pro-Tek 50 Dog Bandanas with other permethrin insect repellent products.

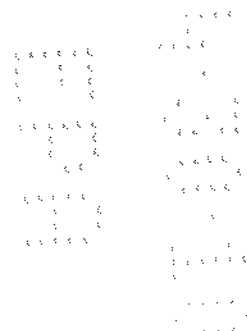
Wash ProTek 50 Dog Bandanas separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS
FABRIC. NOT TO BE REMOVED EXCEPT BY CONSUMER.]



NEW

Master Label: Pro-Tek 50 Dog Bandana

Hang tag sewn on bandana:

PRO-TEK 50 Dog Bandana

Do Not Dry Clean

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings; or
for six months if left unwashed]

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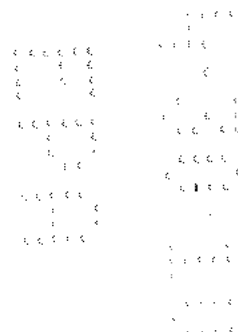
Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 0840978-CHN-001

Discard into trash.

Wash separately.

Refer to label for more
information.



Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

Please reply to:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

Telephone: 410-747-4500
Telefax: 410-747-4928

April 27, 2010

Mr. Richard Gebken
Team 13
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Subject: Amendment of Product Label; EPA Reg. # 83122-1
PRO-TEK 50 Fabric/Apparel (Garment) Treatment

Dear Mr. Gebken:

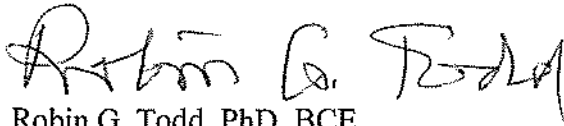
Garnik Industries, LLC ("Garnik") wishes to sell the dog bandanas allowed on the currently approved label for protection against mosquitoes, ticks, fleas, chiggers, and midges. Garnik is providing the following labeling which deals only with the dog bandana use for your review:

1. Application to amend the label to provide clarification to the Directions for Use. The currently accepted label does not describe how to use the pet bandana. This amendment serves to correct this oversight.
2. Revised draft label showing "Directions for Use" for the pet bandana. The last three pages of the master label contain the new labeling for the bandana.

We do not believe that this amendment is subject to a PRIA fee because we are only providing clarification to the Directions for Use on the existing approved label so that the product is used safely and correctly. Nothing else on the label has changed.

Should you require additional information or have questions concerning this submission, please do not hesitate to contact me at 410-747-4500 or by email via RTodd@icrlab.com or Ellen Quinn at EQuinn@icrlab.com.

Sincerely,



Robin G. Todd, PhD, BCE

Technical Consultant & Agent for Garnik Industries, LLC

Enclosures: as above

Cc: G. Innocenti, W. Ball

IB/ PM 13

FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signature: M. WATSON

EPA Reg. Number: <u>83122-1</u>		EPA Receipt Date: <u>5/3/10</u>		
	Check List Item	Yes	No	NA
1	Application Form (EPA Form 8570-1) - signed?	X		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?			X
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?			X
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			X
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]			X
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label Included? (5 copies)	X		
Comments: <u>Label Amendment</u> <u>Label amendment only - no csf</u>				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

May 4, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ROBIN G. TODD, PH.D.
ICR, INC.
GARNIK INDUSTRIES, LLC
1330 DILLON HEIGHTS AVENUE
BALTIMORE, MD 21228-1199

PRODUCT NAME: PRO-TEK 50 FABRIC/APPAREL (GARMENT) TREATMENT
COMPANY NAME: GARNIK INDUSTRIES, LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83122-1
EPA RECEIPT DATE: 04/30/10

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 13, at (703) 305-0120.

Sincerely,

A handwritten signature in cursive script, appearing to read "P. E. Moore", is positioned above the typed name.

Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

^{perm} {8736269~

This package includes the following

☐ New Registration

☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

☐ AD

☐ BPPD

☒ RD

Risk Mgr. **13**

Receipt No.

S-

873626

EPA File Symbol/Reg. No.

83122-1

Pin-Punch Date:

5/3/2010

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ ____

Parent/Child Decisions:

No csf to review. D. Lock 5/7/10

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *[Signature]*

Date: *5/4/10*

Remarks:



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83122-1	2. EPA Product Manager R. Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Pro-Tek 50 Fabric/Apparel (Garment) Treatment	PM# 10	
5. Name and Address of Applicant (Include ZIP Code) Garnik Industries, LLC c/o ICR, Inc. 1330 Dillon Heights Avenue <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Garnik Industries is providing clarification to the Directions for Use on the label of EPA Reg. # 83122-1. The currently approved label allows pet bandanas made from this fabric, but there are no directions on how to use this product correctly and safely. This amendment application contains this clarification for the label.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input checked="" type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other [Specify] _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container each		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other incart _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name Ellen Quinn		Title Regulatory Consultant		
		Telephone No. (Include Area Code) 410-747-4506		
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped)	
2. Signature 		3. Title Technical Consultant, U.S. Agent		
4. Typed Name Robin G. Todd, PhD		5. Date April 27, 2010		

United States



Environmental Protection Agency

Office of Pesticide Programs (7505C)

Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
83122-1

Distributor Company Number
86352

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
PROTEK 50 Fabric/Apparel Treatment

Distributor Product Name
Sweep 8ed Band

Name and Address of Distributor (Type; include ZIP code)

Innovative Textile Solutions
261 5th Avenue, Suite 2001
New York, NY 10016

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor
Agent and Technical Consultant

Robin G. Todd

Date
2/17/10

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant
Agent and Technical Consultant

Robin G. Todd

Date
2/17/10



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

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EPA Registration Number of Product
 83122-1

Distributor Company Number
 86352

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
 PROTEK 50 Fabric/Apparel Treatment

Distributor Product Name
 Sweep Box Spring Protector

Name and Address of Distributor (Type; include ZIP code)

Innovative Textile Solutions
 261 5th Avenue, Suite 2001
 New York, NY 10016

Read All Conditions Before Signing

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2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
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Distributor

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Signature and Title of Distributor
 Agent and Technical Consultant

Robert G. Tordella

Date

2/17/10

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant
 Agent and Technical Consultant

Robert G. Tordella

Date

2/17/10



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

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EPA Registration Number of Product
 83122-1

Distributor Company Number
 86352

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
 PROTEK 50 Fabric/Apparel Treatment

Distributor Product Name
 Sweep Under Mattress Pad

Name and Address of Distributor (Type; include ZIP code)

Innovative Textile Solutions
 261 5th Avenue, Suite 2001
 New York, NY 10016

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
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Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor
 Agent and Technical Consultant

Robert G. Todd

Date

2/17/10

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant
 Agent and Technical Consultant

Robert G. Todd

Date

2/17/10


 United States
Environmental Protection Agency

Office of Pesticide Programs (7505C)

Washington, DC 20460

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 EPA Registration Number of Product
 83122-1

 Distributor Company Number
 86352
Note: Do not submit distributor product labels
 Name of Registered Product (basic product name accepted by EPA)
 PROTEK 50 Fabric/Apparel Treatment

 Distributor Product Name
 Sweep Dust Ruffle
Name and Address of Distributor (Type; include ZIP code)
 Innovative Textile Solutions
 261 5th Avenue, Suite 2001
 New York, NY 10016
Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
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Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Agent and Technical Consultant

Date

2/17/10

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Agent and Technical Consultant

Date

2/17/10



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

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EPA Registration Number of Product
 83122-1

Distributor Company Number
 86352

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
 PROTEK 50 Fabric/Apparel Treatment

Distributor Product Name
 Sweep Under Furniture Pad

Name and Address of Distributor (Type; include ZIP code)

Innovative Textile Solutions
 261 5th Avenue, Suite 2001
 New York, NY 10016

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
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Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Agent and Technical Consultant

Robin G. Tish

Date

2/17/10

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Agent and Technical Consultant

Robin G. Tish

Date

2/17/10



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

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EPA Registration Number of Product
 83122-t

Distributor Company Number
 86352

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
 PROTEK 50 Fabric/Apparel Treatment

Distributor Product Name
 Sweep Headboard Backing

Name and Address of Distributor (Type; include ZIP code)

Innovative Textile Solutions
 261 5th Avenue, Suite 200t
 New York, NY 10016

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
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Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor
 Agent and Technical Consultant

Robin G. Toldel

Date

2/17/10

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant
 Agent and Technical Consultant

Robin G. Toldel

Date

2/17/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Robin Todd, PhD
Agent for Garnick Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

FEB 22 2010

Dear Dr. Todd:

Subject: Label amendment- response to Agency letter dated January 27,
2010
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your email dated February 22, 2010

The application referred to above, submitted in connection with
registration under the Federal Insecticide, Fungicide, and Rodenticide
Act, as amended, is acceptable.

A copy of a stamped label is enclosed for your records.

If you have any questions regarding this action, please contact
Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Linda A. DeLuise".

f Richard Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7505P)

Enclosure

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours
Insecticidal (killing) action remains effective for up to 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83 t22-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin

0.52 %

Other Ingredients:

99.48 %

Total

100.00 %

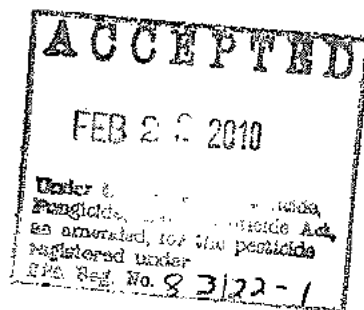
Manufactured by:

Garnik Industries, LLC

219 Scott Street, # t82

Beaufort, SC 29902-5554

Net Contents: one item each package



DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

1. Bed Band

Stretch bed band around edges of mattress and secured tightly using the Velcro or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact to persons lying on the bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.]

4. Box Spring Protector

Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

5. Under Mattress Pad

Place pad between mattress and box spring and secure with straps. If no box spring lay strapless under mattress pad on surface directly beneath mattress.

6. Under Furniture Pad

Place pad under furniture and secure as directed.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs that
stay in contact for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings)

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

**SIX TREATED FABRIC PRODUCTS WHICH KILL BED BUGS
ON & AROUND BEDS**

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours. If no box spring, use under mattress pad that does not have bands.

6. Under Furniture Pad

Place under furniture pad underneath item of furniture and secure. Kills bed bugs that remain in contact with treated under furniture pad for at least 24 hours.

- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] [under mattress pad] [under furniture pad] for at least 24 hours
- Bed bugs come out to feed on human hosts
- Bed bugs typically feed at night
- Bed bugs may hide in your headboard and lay eggs
- Blood taken from humans is the food of bed bugs
- Bed bug bites may cause welts which become irritated, inflamed and itchy
- Bed bug colonies may cause offensive odors
- Female bed bugs can lay over 200 eggs in their lifetime
- Newly hatched bed bugs begin feeding immediately
- Bed bugs have a piercing beak
- Treated fabric has no odor and is washable up to 20 times
- Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- "New" (for allowable time frame)
- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] for at least 24 hours.
- Insecticidal (killing) action remains effective for up to 20 washings.
- Kills bed bugs that stay in contact with fabric for at least 24 hours between your box spring and mattress, or under mattress if no box spring – *(for box spring protector, under mattress pad and dust ruffle only)*
- Kills bed bugs that stay in contact with under furniture pad for at least 24 hours.

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

Please reply to:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

Telephone: 410-747-4500
Telefax: 410-747-4928

Ms. Linda Deluise; Team 10
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Subject: Response to Amendment of Product Label dated January 27, 2010
PRO-TEK 50 Fabric/Apparel (Garment) Treatment
EPA Registration Number: 83122-1

Dear Ms. Deluise:

In response to your guidance, please find attached the corrected master product label for the PRO-REK 50 Fabric Apparel (Garment) Treatment, EPA Reg. # 83122-1, with the corrections highlighted on one file copy and not highlighted on the second file copy.

Thank you very much for your assistance. We look forward to receiving our EPA stamped accepted label.

Please do not hesitate to contact me or Ellen Quinn at 410-747-4500, or by email at RTodd@icrlab.com, or EQuinn@icrlab.com if you have any questions.

Sincerely,



Robin G. Todd, PhD, BCE
Technical Consultant & Agent for Garnik Industries, LLC

Enclosures (attachments): corrected label; one copy with corrections highlighted

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

**SIX TREATED FABRIC PRODUCTS WHICH KILL BED BUGS
ON & AROUND BEDS**

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours. If no box spring, use under mattress pad that does not have bands.

6. Under Furniture Pad

Place under furniture pad underneath item of furniture and secure. Kills bed bugs that remain in contact with treated under furniture pad for at least 24 hours.

- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] [under mattress pad] [under furniture pad] for at least 24 hours
- Bed bugs come out to feed on human hosts
- Bed bugs typically feed at night
- Bed bugs may hide in your headboard and lay eggs
- Blood taken from humans is the food of bed bugs
- Bed bug bites may cause welts which become irritated, inflamed and itchy
- Bed bug colonies may cause offensive odors
- Female bed bugs can lay over 200 eggs in their lifetime
- Newly hatched bed bugs begin feeding immediately
- Bed bugs have a piercing beak
- Treated fabric has no odor and is washable up to 20 times
- Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- "New" (for allowable time frame)
- Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] for at least 24 hours.
- Insecticidal (killing) action remains effective for up to 20 washings.
- Kills bed bugs that stay in contact with fabric for at least 24 hours between your box spring and mattress, or under mattress if no box spring – *(for box spring protector, under mattress pad and dust ruffle only)*
- Kills bed bugs that stay in contact with under furniture pad for at least 24 hours.

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

**PRO-TEK 50
Fabric/Apparel (Garment) Treatment**

This fabric/apparel (garment) has been treated with **PRO-TEK 50
Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours
Insecticidal (killing) action remains effective for up to 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains
effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments,
sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor
furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed
netting, domestic animal care products (pet bedding, pet blankets and netting), and pet
bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for
non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and
stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:	
Permethrin	0.52 %
Other Ingredients:	99.48 %
Total	100.00 %

Manufactured by:
Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

Net Contents: one item each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

1. Bed Band

Stretch bed band around edges of mattress and secured tightly using the Velcro or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact to persons lying on the bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.]

4. Box Spring Protector

Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

5. Under Mattress Pad

Place pad between mattress and box spring and secure with straps. If no box spring lay strapless under mattress pad on surface directly beneath mattress.

6. Under Furniture Pad

Place pad under furniture and secure as directed.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs that
stay in contact for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.



Environmental Protection Agency

Office of Pesticide Programs (7505C)

Washington, DC 20480

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

83122-1

15A-6.1

Distributor Company Number

86352

Note: Do not submit distributor product labels

Name of Registered Product (Basic product name accepted by EPA)

Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Distributor Product Name

Sweep Dog Bandana

Name and Address of Distributor (Type; include ZIP code)

Innovative Textile Solutions, Inc.

261 5th Avenue

New York, NY 10016

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Technical Advisor

Date

12/6/10

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Technical Advisor

Date

12/6/10



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

ML 12/6/10

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
83122-1

Distributor Company Number
84352

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment

Distributor Product Name
PRO-TEK 50 Dog Bandana

Name and Address of Distributor (Type; include ZIP code)

Innovative Textile Solutions
261 5th Avenue, Suite 2001
New York, NY 10016

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Agent and Technical Consultant

Date

12/2/10

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Agent and Technical Consultant

Date

12/2/10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Robin Todd, PhD
Agent for Garnick Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

JAN 27 2010

Dear Dr. Todd:

Subject: Label amendment- add four bedding items
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submission dated January 1, 2010

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable.

A copy of a stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

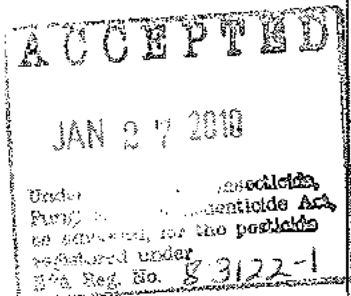
A handwritten signature in cursive script, appearing to read "Richard Gebken".

Richard Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7505P)

Enclosure

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)



SIX TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON & AROUND BEDS

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.

5. Under Mattress Pad

Place under mattress pad between mattress and box spring and secure with elastic bands. Kills bed bugs that remain in contact with treated under mattress pad for at least 24 hours.

6. Under Furniture Pad

Place under furniture pad underneath item of furniture and secure. Kills bed bugs that remain in contact with treated under furniture pad for at least 24 hours.

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours
Insecticidal (killing) action remains effective for up to 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

1. Bed Band

Stretch bed band around edges of mattress and secured tightly using the Velcro or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact to persons lying on the bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.]

4. Box Spring Protector

Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

5. Under Mattress Pad

Place pad between mattress and box spring and secure with straps.

6. Under Furniture Pad

Place pad under furniture and secure as directed.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs that
stay in contact for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.



United States
Environmental Protection Agency
Washington, DC 20460

Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83122-1	2. EPA Product Manager R. Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PRO-TEK 50 Fabric/Apparel (Garment) Treatment	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Garnik Industries, LLC c/o ICR, Inc. 1330 Dillon Heights Avenue Baltimore MD 21228 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional pages if necessary. (For section I and Section II.)

Garnik Industries, LLC is amending their product label. In addition to the already approved 4 bedding items produced with the PRO TEK fabric, Garnik is adding an under mattress pad and an under furniture pad.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	<input type="checkbox"/> Plastic
* Certification must be submitted				<input type="checkbox"/> Glass	<input type="checkbox"/> Paper
	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input checked="" type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container varied	5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product		
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Robin G. Todd, PhD	Title Technical Consultant	Telephone (No. (include Area Code) 410-747-4500
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		Date Application Received (Stamped)
2. Signature 	3. Title Technical Consultant	
4. Typed Name Robin G. Todd	5. Date 01/01/2010	



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Garnik Industries, LLC c/o ICR, Inc. 1330 Dillon Heights Avenue Baltimore, MD 21228-1199	EPA File Symbol/Registration Number
	Product Name PRO-TEK 50 Fabric/Apparel (Garment) Treatment
	Date of Confidential Statement of Formula (EPA Form 8570-4) 07/09/2008

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Permethrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 156.50(e)(2) or (3).



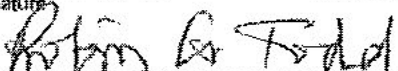
(3) Indicate by checking (A) or (B) below which paragraph applies:

☐ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☒ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Permethrin		
Signature 	Name and Title Robin G. Todd, Tech. Consultant	Date 01/04/2010

300 → *Amended*

IB/PM 13

FAST-TRACK AMENDMENTS-Completeness Screening Checklist

Experts In-Processing Signature: *M. LAPELLE*

EPA Reg. Number: <i>83122-1</i>		EPA Receipt Date: <i>1/15/10</i>		
	Check List Item	Yes	No	NA
1	Application Form (EPA Form 8570-1) - signed?	<i>X</i>		
2	Confidential Statement of Formula (EPA Form 8570-29) -- signed?			<i>X</i>
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?		<i>X</i>	
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed? <i>?</i>	<i>X</i>		
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]		<i>X</i>	
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label Included? (5 copies)	<i>X</i>		
Comments:				
<i>LABEL AMENDMENT.</i>				
<i>* SEE NOTE TO PM.</i>				

Receipt for Section 3

S: 885644

Resubmission: ☐ Yes ☒ No

Regulatory Type: Product Registration - Section 3

Fee For Service: ☐ Yes ☒ No

Application Type: Amendment

Billable: ☐ Yes ☒ No

Company: 83122 GARNIK INDUSTRIES, LLC V

Risk Manager: Registration Division, Risk Management Team 13

Product #: 83122-1 Product Name: PRO-TEK 50 FABRIC/APPAREL (GARMENT) 1

Overrides:

Me Too Section3: Me Too Product Name:

Application Date: 04-Jan-2010 icl

OPP Rec'd Date: 15-Jan-2010 icl

Front End Date: 19-Jan-2010 icl

Risk Manager Send Date: 20-Jan-2010 icl

FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

Amendment of product label

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

Tracking

Receipt Content

Des

Paper Label

View/Edit

New Ingredient

Request Date:

New Ingredient

Received Date:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

January 20, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ROBIN G. TODD, PH.D.
ICR, INC.
GARNIK INDUSTRIES, LLC
1330 DILLON HEIGHTS AVENUE
BALTIMORE, MD 21228-1199

PRODUCT NAME: PRO-TEK 50 FABRIC/APPAREL (GARMENT) TREATMENT
COMPANY NAME: GARNIK INDUSTRIES, LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83122-1
EPA RECEIPT DATE: 01/15/10

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 13, at (703) 305-6701.

Sincerely,

P. K. Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{865644;~

This package includes the following

- ☐ New Registration
- ☒ Amendment

- ☐ Studies? ☐ Fee Waiver?
- ☐ volpay % Reduction: _____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 13

Receipt No.

S- 865644

EPA File Symbol/Reg. No.

83122-1

Pin-Punch Date:

1/15/2010

☒ This item is NOT subject to FFS action.

Action Code:

Requested: R340

Granted: *R340*

Amount Due: \$ *0.00*

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: *Julie Ann Chad* Date: *1/20/10*

Remarks: The additional uses (under-mattress pad and under-furniture pad) do not appear to significantly expand the currently registered use. However, if PM thinks this needs to be reviewed for additional exposure potential, please return to Linda Amington for coding.

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

Please reply to:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

Telephone: 410-747-4500
Telefax: 410-747-4928
Email: ContactICR@icrlab.com

January 4, 2010

Mr. Richard Gebken and Ms. Olga Odiott
Team 13
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Subject: Amendment of Product Label --(R340); EPA Reg. # 83122-1
PRO-TEK 50 Fabric/Apparel (Garment) Treatment

Dear Mr. Gebken:

Garnik Industries, LLC is providing the following for your review:

1. Application to amend the label to include two new bed bug products: the Under Mattress Pad, and the Under Furniture Pad.
2. Revised draft label showing these two new types of bed bug products.
 - a. Under Mattress Pad: Placed under the mattress (between box spring and mattress) and held in place with elastic bands. The pad does not extend further than the mattress.
 - b. Under Furniture Pad: Placed under items of furniture; does not extend further than the bottom of the item of furniture.
3. Formulator's exemption form
4. We are sending the PRIA fee by company check # 6522 in the amount of \$3444.00 by certified mail to the Washington Finance Center in St. Louis, MO. All correspondence concerning the PRIA fee should be sent to me at:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228

Nothing else has changed with this treated fabric registration, except the addition of two very similar bed bug products to the label.

Should you require additional information or have questions concerning this submission, please do not hesitate to contact me at 410-747-4500 or by email via RTodd@icrlab.com. or Ellen Quinn at EQuinn@icrlab.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin G. Todd". The signature is fluid and cursive, with the first name "Robin" and last name "Todd" being more prominent than the middle initial "G".

Robin G. Todd, PhD, BCE
Technical Consultant & Agent for Garnik Industries, LLC

Enclosures: as above

Cc: G. Innocenti, W. Ball, & J. Erdheim

Page 2 of 2

Insect Control & Research
1350 Dillon Heights Ave
Catonsville, MD 21228-1122
410-747-4500

IC 01/01

WACHOVIA BANK, N.A. A L ASSOCIATION
BALTIMORE, MD 21201
65-320/530

6522

1/14/2010

PAY TO THE
ORDER OF U.S. EPA

\$ **3,444.00

Three Thousand Four Hundred Forty-Four and 00/100***** DOLLARS

U.S. EPA
Washington Finance Center
FIFRA Service Fees
PO Box 979074
St. Louis, MO 63197-9000
EPA Reg.# 83122-1 label amendment

⑈006522⑈

Insect Control & Research Inc

6522

U.S. EPA

1/14/2010

Garnik Reg. # 83122-1

3,444.00

Commercial/financial information may be entitled to confidential treatment

Cash in Wachovia- IC EPA Reg.# 83122-1 label amendment

3,444.00



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Robin Todd, PhD
Agent for Garnick Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

DEC 16 2009

Dear Dr. Todd:

Subject: Label amendment- add net contents
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submission dated November 11, 2009

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable.

A copy of a stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Richard Gebken".

Richard Gebken
Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Enclosure

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

♦ **FOUR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON & AROUND BEDS**

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band for at least 24 hours.

2. Bedskirt or Dust Ruffle

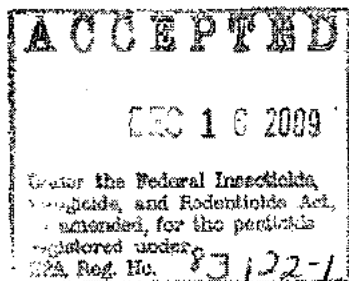
Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle for at least 24 hours.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing for at least 24 hours.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector for at least 24 hours.



- ◆ Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] for at least 24 hours
- ◆ Bed bugs come out to feed on human hosts
- ◆ Bed bugs typically feed at night
- ◆ Bed bugs may hide in your headboard and lay eggs
- ◆ Blood taken from humans is the food of bed bugs
- ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ◆ Bed bug colonies may cause offensive odors
- ◆ Female bed bugs can lay over 200 eggs in their lifetime
- ◆ Newly hatched bed bugs begin feeding immediately
- ◆ Bed bugs have a piercing beak
- ◆ Treated fabric has no odor and is washable up to 20 times
- ◆ Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds for at least 24 hours
- ◆ “New” (for allowable time frame)
- ◆ Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] for at least 24 hours. Insecticidal (killing) action remains effective for up to 20 washings.
- ◆ Kills bed bugs that stay in contact with fabric for at least 24 hours between your box spring and mattress – *(for box spring protector and dust ruffle only)*

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours
Insecticidal (killing) action remains effective for up to 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

Net Contents: one item each package

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

1. Bed Band

Stretch bed band around edges of mattress and secured tightly using the Velcro or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact to persons lying on the bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.]

4. Box Spring Protector

Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs that
stay in contact for at least 24 hours.
Insecticidal activity remains
Effective up to 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-I
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

Refer to insert for more
information.



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83122-1	2. EPA Product Manager Richard Gebken	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PRO-TEK 50 Fabric/Apparel (Garment) Treatment	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Garnik Industries, LLC 219 Scott Street, # 182 Beaufort, SC 29902-5554 <input checked="" type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: <input checked="" type="checkbox"/> EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Ma Tso" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Garnik Industries, LLC is required by EPA to add a Net Contents statement to their label. No PMA fee is required as this is an Agency required label item.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
If "Yes" Unit Packaging wgt.		No. per container	If "Yes" Package wgt	No. per container	<input type="checkbox"/> Glass
					<input type="checkbox"/> Paper
					Other (Specify) _____
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container N/A fabric		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input checked="" type="checkbox"/> Other label incarted			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Robin G. Todd, PhD, BCE	Title Tech. Consultant/Agent	Telephone No. (Include Area Code) 410-747-4500
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment as both under applicable law.		8. Date Application Received (Stamped)
2. Signature 	3. Title Technical Consultant & Agent	
4. Typed Name Robin G. Todd, PhD, BCE	5. Date Nov 11, 2009	

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

Please reply to:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

Telephone: 410-747-4500
Telefax: 410-747-4928

Mr. Richard Gebken and Ms. Olga Odiott, Team 10
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Subject: Amendment of Product Label
PRO-TEK 50 Fabric/Apparel (Garment) Treatment
EPA Registration Number: 83122-1

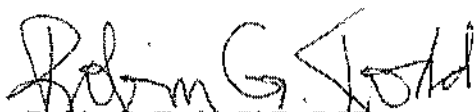
Dear Mr. Gebken and Ms. Odiott:

Thank you for your phone call notifying us that after your conversation with the State of Texas pesticide registration personnel, you agree that "Garnik" (Garnik Industries, LLC) must add a net contents to their products as required by Federal regulations. It is our understanding that since the net contents statement is a Federal requirement, there will be no PRIA fee involved with this amendment application. Thank you for your willingness to review this amendment as quickly as possible. Please find enclosed:

1. Amended product label with the net contents statement added, and the repetition of the "Kills bed bugs that remain in contact with treated ... **for at least 24 hours.**" statement noted in the Nov 4, 2009 letter from you (signed by Linda DeLuise).
2. Application to amend product label.

If you require additional information or have any questions, please do not hesitate to contact me or Ellen Quinn at 410-747-4500, or by email at RTodd@icrlab.com, or EQuinn@icrlab.com.

Sincerely,

A handwritten signature in black ink, appearing to read "Robin G. Todd". The signature is stylized with a large, looped "R" and a long, sweeping "T".

Robin G. Todd, PhD, BCE

Technical Consultant & Agent for Gamik Industries, LLC

Enclosures: revised label, application

Cc: G. Innocenti, W. Ball, & J. Erdheim

FAST-TRACK AMENDMENTS - Completeness Screening Checklist

Experts In-Processing Signature: [Signature]

EPA Reg. Number: 83122-1

EPA Receipt Date: 12/11/09

	Check List Item	Yes	No	NA
1	Application Form (EPA Form 8570-1) - signed?	<input checked="" type="checkbox"/>		
2	Confidential Statement of Formula (EPA Form 8570-29) -- signed?			<input checked="" type="checkbox"/>
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?			<input checked="" type="checkbox"/>
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			<input checked="" type="checkbox"/>
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]			<input checked="" type="checkbox"/>
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label Included? (5 copies)	<input checked="" type="checkbox"/>		
	Comments:			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 14, 2009

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

ROBIN G. TODD, PH.D.
ICR, INC.
GARNIK INDUSTRIES, LLC
1330 DILLON HEIGHTS AVENUE
BALTIMORE, MD 21228-1199

PRODUCT NAME: PRO-TEK 50 FABRIC/APPAREL (GARMENT) TREATMENT
COMPANY NAME: GARNIK INDUSTRIES, LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 83122-1
EPA RECEIPT DATE: 12/11/09

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 13, at (703) 305-6701.

Sincerely,

P. K. Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

M
{863967}~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. **13**

Receipt No.

S- **863967**

EPA File Symbol/Reg. No.

83122-1

Pin-Punch Date:

12/11/2009



This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ ____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: S. Hill

Date: 12/14/09

Remarks:



Re: Revision of label for 83122-1 to include net contents on label(s) 

Richard Gebken to: EQuinn

11/12/2009 08:15 AM

Cc: Olga Odiott, rtodd

Ellen,

Refer to my comments below.

Hello Richard and Olga, I would like to verify a c...

11/10/2009 11:09:28 AM

From: <EQuinn@icrlab.com>
To: Olga Odiott/DC/USEPA/US@EPA, Richard Gebken/DC/USEPA/US@EPA
Cc: <rtodd@icrlab.com>
Date: 11/10/2009 11:09 AM
Subject: Re: Revision of label for 83122-1 to include net contents on label(s)

Hello Richard and Olga,

I would like to verify a couple things so that my conversation with our registrant can be completed in one event.

1. I am looking at PR Notice 98-10, and it says that a change in package size and net content is a non-notification (IV.B). This is correct. This is a change-we are simply adding the statement, but does not appear to require notification or amendment.

FIFRA required language is always reviewed as an amendment.

2. We have the amendment application going in for the Garnik label to allow bed bug products # 5 and # 6 on the label, which are Mattress protector (this goes under the mattress, and does not go up the sides of the mattress at all), and under furniture protector (which also will be held in place only under a piece of furniture). When we submit this label amendment application, we can note on this label the package contents. Yes you can.

3. We are submitting an R340 applicaiton for \$3444.00, and the review time will be up to four months. Until our amendment is (hopefully!) accepted, the previous label is allowed to be used, correct, except for Texas? None of the other states have objected. And, just as important, all of the subregistered labels for the specific products numbers 1-4 on the Garnik label (such as Innovative Textile Solutions' (ITS) Headboard Protector, Bed Band, etc.) are allowed to be used, correct?

We would not have any objections, since it was also an oversight on the Agency's part.

4. We are in the midst of preparing the ITS state (sub)registrations of the 4 bedbug products for 50 states. We can add the net contents to the labels going in with the renewals, as changing the net contents is a non-notification, correct?

In order to affect state renewals,

the FIFRA label must also be aligned to the state labels.

This would require an amendment to affect this change.

It is important that ITS not get caught in a stop sale mess, so it is important we know we are handling things correctly.

We will try our utmost to accommodate a quick label review and turn around to add the net contents to the existing stamped approved label, provided this is the only change you intend to make to the label.

If a phone call will help instead of emails, please give me a call at 410-747-4500.

Thanks very much,
Ellen

Ellen Quinn
Associate Director, Administration
Regulatory & Product Performance Consulting
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228
phone # 410-747-4500
fax # 410-747-4928

----- Original Message -----

From: <Gebken.Richard@epamail.epa.gov>
To: "Ellen Quinn" <EQuinn@icrlab.com>; <Odiott.Olga@epamail.epa.gov>
Cc: <rtodd@icrlab.com>
Sent: Monday, November 09, 2009 3:22 PM
Subject: Revision of label for 83122-1 to include net contents on label(s)

>
> Ellen,
>
> Per our conversation today, please be advised it came to our attention
> (through the state of Texas) that the Pro-Tek 50 Fabric/Apparel
> (Garment) Treatment label(s) does/do not contain any net contents per
> 40CFR 156.10 (d).
>
> Please review the applicable section of 40 CFR, and present a label
> amendment incorporating the required language into your label which
> addresses this deficiency. If necessary, the Agency can assist you in
> drafting language that will accommodate this provision of the
> regulations, and bring this product into compliance with all required
> FIFRA language.
>
> Thanks,
>
> Richard Gebken



Re: Revision of label for 83122-1 to include net contents on label(s)

EQuinn to: Olga Odiott, Richard Gebken

11/10/2009 11:09 AM

Cc: rtodd

Please respond to EQuinn

Hello Richard and Olga,

I would like to verify a couple things so that my conversation with our registrant can be completed in one event.

1. I am looking at PR Notice 98-10, and it says that a change in package size and net content is a non-notification (IV.B). This is a change-we are simply adding the statement, but does not appear to require notification or amendment.

2. We have the amendment application going in for the Garnik label to allow bed bug products # 5 and # 6 on the label, which are Mattress protector (this goes under the mattress, and does not go up the sides of the mattress at all), and under furniture protector (which also will be held in place only under a piece of furniture). When we submit this label amendment application, we can note on this label the package contents.

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4. We are in the midst of preparing the ITS state (sub)registrations of the 4 bedbug products for 50 states. We can add the net contents to the labels going in with the renewals, as changing the net contents is a non-notification, correct?

It is important that ITS not get caught in a stop sale mess, so it is important we know we are handling things correctly.

If a phone call will help instead of emails, please give me a call at 410-747-4500.

Thanks very much,
Ellen

Ellen Quinn
Associate Director, Administration
Regulatory & Product Performance Consulting
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228
phone # 410-747-4500
fax # 410-747-4928

----- Original Message -----

From: <Gebken.Richard@epamail.epa.gov>

To: "Ellen Quinn" <EQuinn@icrlab.com>; <Odiott.Olga@epamail.epa.gov>

Cc: <rtodd@icrlab.com>

Sent: Monday, November 09, 2009 3:22 PM

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> drafting language that will accommodate this provision of the
> regulations, and bring this product into compliance with all required
> FIFRA language.
>
> Thanks,
>
> Richard Gebken



RE: Net contents label statement for EPA Reg. No. 83122-1

Ed Gage to: Olga Odiott

Cc: Richard Gebken, "Ed Gage"

11/10/2009 11:12 AM

Thanks for the notification. We will wait for the revised label to come out before approving the registration.

Ed Gage
Pesticide Registration Coordinator
Section 3 Texas Registrations
Special Registrations, S-18, 24(c), 2ee, EUP
Texas Department of Agriculture
P.O. Box 12847
Austin, Texas 78711
Phone: (512) 463-7544
Fax: 1-888-216-9860
ed.gage@TexasAgriculture.gov
www.tda.state.tx.us

-----Original Message-----

From: Odiott.Olga@epamail.epa.gov [mailto:Odiott.Olga@epamail.epa.gov]

Sent: Tuesday, November 10, 2009 9:03 AM

To: Ed Gage

Cc: Gebken.Richard@epamail.epa.gov

Subject: Net contents label statement for EPA Reg. No. 83122-1

Mr. Gage;

Thank you for your phone call of last Thursday inquiring about the net contents statement for the subject label. We contacted the Registrant and asked for submission of a label amendment incorporating the required language into the product's label. Thank you again for bringing this issue to our attention.

Sincerely,

Olga Odiott

Olga Odiott, Senior Biologist
Insecticides Branch / Registration Division Office of Pesticide Programs
U.S. Environmental Protection Agency
(703) 308-9369
(703) 305-6596 (fax)
odiott.olga@epa.gov



Revision of label for 83122-1 to include net contents on label(s)

Richard Gebken to: Ellen Quinn, Olga Odiott

11/09/2009 03:22 PM

Cc: rtodd

Ellen,

Per our conversation today, please be advised it came to our attention (through the state of Texas) that the Pro-Tek 50 Fabric/Apparel (Garment) Treatment label(s) does/do not contain any net contents per 40CFR 156.10 (d).

Please review the applicable section of 40 CFR, and present a label amendment incorporating the required language into your label which addresses this deficiency. If necessary, the Agency can assist you in drafting language that will accommodate this provision of the regulations, and bring this product into compliance with all required FIFRA language.

Thanks,

Richard Gebken



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. Robin Todd, PhD
Agent for Garnick Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

NOV - 4 2009

Dear Dr. Todd:

Subject: Label amendment- per Agency letter dated March 24, 2009
PRO-TEK 50 Fabric/ Apparel (Garment) Treatment
EPA Registration Number 83122-1
Your submission dated August 21, 2009

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. As requested in the Agency letter dated March 24, 2009 item 3b, please qualify the bed bug claim as follows: "Kills bed bugs that remain in contact with treated ...for at least 24 hours."

A copy of a stamped label is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Richard Gebken".

Richard Gebken
Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Enclosure

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

◆ **FOUR TREATED FABRIC PRODUCTS WHICH KILL BED BUGS ON & AROUND BEDS**

1. Bed Band

Band of hemmed, treated fabric which wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro or other means at each end of band. Kills bed bugs that remain in contact with treated bed band.

2. Bedskirt or Dust Ruffle

Fabric section (a 'flat') which covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt which hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements. Kills bed bugs that remain in contact with treated bedskirt or dust ruffle.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the head board by tacking or glue or is installed during manufacture. Several sizes available. Kills bed bugs that remain in contact with treated headboard backing.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic. Kills bed bugs that remain in contact with treated box spring protector.

REGISTERED
EPA 8200-10-01
EPA Label 8200-10-01
NOV 14 2009
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, the pesticide
registered under EPA Reg. No.
8200-10-01

- ◆ Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector]
- ◆ Bed bugs come out to feed on human hosts
- ◆ Bed bugs typically feed at night
- ◆ Bed bugs may hide in your headboard and lay eggs
- ◆ Blood taken from humans is the food of bed bugs
- ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ◆ Bed bug colonies may cause offensive odors
- ◆ Female bed bugs can lay over 200 eggs in their lifetime
- ◆ Newly hatched bed bugs begin feeding immediately
- ◆ Bed bugs have a piercing beak
- ◆ Treated fabric has no odor and is washable up to 20 times
- ◆ Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds
- ◆ "New" (for allowable time frame)
- ◆ Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector] . Insecticidal (killing) action remains effective for up to 20 washings.
- ◆ Kills bed bugs between your box spring and mattress – *(for box spring protector and dust ruffle only)*

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Insert into package of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs that remain in contact with treated fabric for at least 24 hours
Insecticidal (killing) action remains effective for up to 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

The use of fabric treatments will reduce the effectiveness of the product

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

[Bed Bug Products Only:]

1. Bed Band

Stretch bed band around edges of mattress and secured tightly using the Velcro or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact to persons lying on the bed.

2. Bedskirt or Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove head board and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.]

4. Box Spring Protector

Place box spring protector inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS INSERT FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn into fabric:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs.
Insecticidal activity remains
Effective up to 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 084098-CHN-001

Discard in Trash.

Wash separately.

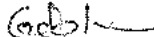
Refer to insert for more
information.

August 21, 2009

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

Ms. Kimberly Nesci PM 13
Insecticide Branch, Registration Division
Document Processing Desk
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

SUBJECT: PRO-TEK 50 Fabric/Apparel (Garment) Treatment
EPA Reg. No. 83122-1
Revised label


Dear Ms. Nesci: 

We are now submitting a revised version of the label for PRO-TEK 50 Fabric/Apparel (Garment) Treatment as required in your March 24, 2009 letter (signed by Ms. Olga Odiott) in order for this product to be released for shipping.

Please note that the product will not be shipped or sold as PRO-TEK 50. The product has been sub-registered to Innovative Textile Solutions, Inc. who will market it as TMSWEEP. Market labels for TMSWEEP products will be submitted to all the states in which TMSWEEP is going to be registered.

If you have any questions, please do not hesitate to contact me (RTodd@icrlab.com), Ellen Quinn (EQuinn@icrlab.com), or Susan Livingston (slivingston@icrlab.com); we can all be reached at 410-747-4500.

Yours sincerely,



Robin G. Todd, PhD. BCE
Technical Consultant & Agent for Garnik Industries, LLC.

Encl.

Cc: Wm. Ball
G. Innocenti
J. Erdheim



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

83122-1

Distributor Company Number

85005

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

PRO-TEK 50

Distributor Product Name

Q-TEK

Name and Address of Distributor (Type; include ZIP code)

QUARTER CORPORATION
4180 PIEDMONT PARKWAY
GREENSBORO, NC 27410-8154

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..." or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Walter J. Smith, LVP

Date

6/17/09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Kevin P. Baker, VP Research & Development

Date

6/17/2009



United States
Environmental Protection Agency
 Office of Pesticide Programs (7505C)
 Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
 83122-1

Distributor Company Number
 86352

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
 PROTEK 50 Fabric/Apparel (Garment) Treatment

Distributor Product Name
 SWEEP Fabric/Apparel (Garment) Treatment

Name and Address of Distributor (Type; include ZIP code)

Innovative Textile Solutions
 261 5th Avenue, Suite 2001
 New York, NY 10016

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Robin G. Tiedel Agent and Technical Consultant

Date

6/25/09

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Robin G. Tiedel Agent and Technical Consultant

Date

6/25/09



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 24 2009

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Robin G. Todd, PhD, BCE
Agent for Garnik Industries, LLC
ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

Subject: Application to Add Bed Bugs Claims for Bedding Treated Products

PRO-TEK 50 Fabric/Apparel (Garment) Treatment

EPA Reg. No. 83122-1

Your submissions dated July 9, 2008 and December 5, 2008

Dear Dr. Todd:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. The treated fabric products (bed band, dust ruffle, headboard backing, and box spring protector) must be produced without the addition of sizing or other fabric treatments.
2. The products must be made entirely of treated fabric, stitching, elastic, and zippers excluded.
3. Add statements to the front panel of the label clearly stating that:
 - a. the product will kill bed bugs that remain in contact with treated fabric for at least 24 hours.
 - b. the use of fabric treatments will reduce the effectiveness of the product.
4. Revise the following marketing claims as addressed below (additions to the marketing claims are underlined):
 - a. Kills bed bugs that [live][remain][stay] in contact with treated [bed band][dust ruffle][headboard backing][box spring protector]
 - b. Bed bugs may hide in your headboard and lay eggs
 - c. Treated fabric has no odor and is washable up to 20 times

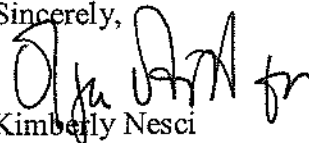
- d. Kills bed bugs between your box spring and mattress – (*for Box Spring Protector and Dust ruffle only*)
 - e. Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds
 - f. Kills bed bugs that [live] [remain] [stay] in contact with treated [bed band] [dust ruffle] [headboard backing] [box spring protector]. Insecticidal (killing) action remains effective for up to 20 washings.
5. The marketing claim “New” may be used for a period of 6 months from the date of first distribution.
6. Revise the statement “*Repellency to mosquitoes....patio or umbrella covers...*” to read “*Repellency to mosquitoes....patio umbrella covers...*”

Please note that a notice of availability of EPA’s reregistration eligibility document (RED) for products containing permethrin was published in the FR on June 28, 2006 (Vol. 71 No. 124 pg. 36788). Additional data and/or labeling changes may be required for products containing permethrin.

The alternate formulation confidential statement of formula (CSF) dated 09/29/08 is acceptable. A copy of the CSF has been inserted in the file for the subject product.

If you have questions regarding this action, please contact Olga Odiott at (703) 308-9369.

Sincerely,



Kimberly Nesci
Interim Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Enclosure

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

♦ **FOUR TREATED FABRIC PRODUCTS WHICH
KILL BED BUGS ON & AROUND BEDS**

1. Bed Band

Band of hemmed, treated fabric that wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro® or other means at each end of band.

2. Dust Ruffle

Fabric section (a 'flat') covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt that hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the headboard by tacking or glue or is installed during manufacture. Several sizes are available.

4. Box Spring Protector

-Model A: Treated fabric covers top and sides of the box spring and is secured by gathered elastic stitched along the edge of the protector.

-Model B: The treated fabric is a pouch with a zipper along one side. The box spring is placed inside and zipped closed.

ACCEPTED
with COMMENTS
In EPA Letter Dated

MAR 24 2009

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

83122-1

- ◆ Kills bed bugs
 - ◆ Bed bugs come out to feed on human hosts
 - ◆ Bed bugs typically feed at night
 - ◆ Bed bugs may hide in your back board and lay eggs
 - ◆ Blood taken from humans is the food of bed bugs
 - ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
 - ◆ Bed bug colonies may cause offensive odors
 - ◆ Female bed bugs can lay over 200 eggs in their lifetime
 - ◆ Newly hatched bed bugs begin feeding immediately
 - ◆ Bed bugs have a piercing beak
 - ◆ Treated fabric has no odor and is washable
 - ◆ Kills bed bugs between your box-spring and mattress
 - ◆ Kills bed bugs that hide in your headboard corners, frame and folds
 - ◆ “New” (for allowable time frame)
- Kills bed bugs. Insecticidal (killing) action remains effective for up to 20 washings.

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment Hang Tag

Hang Tag on Outside of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs. Insecticidal (killing) action remains effective through 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio or umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric or apparel (garment) with other permethrin insect repellent products.

[For repellency protection of skin exposed by treated apparel, use in conjunction with insect repellent approved for use by topical (direct) application to skin.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Bed Bug Products Only:

1. Bed Band

Stretch bed band around edges of mattress and secure tightly using the Velcro® or other closures provided. Make sure that band is not positioned above the top of the mattress to avoid contact with persons lying on the bed.

2. Dust Ruffle

Remove mattress. Place over top of box spring or foundation so that it entirely covers it, with the skirt draping around all four sides. Replace the mattress on top of the covered box spring or foundation.

3. Headboard Backing

Remove headboard and place on floor, front side down. Attach backing to back of headboard by tacking or with glue. Reattach headboard to bed or hang on wall at head of bed as appropriate.

4. Box Spring Protector

Place box spring inside pouch so that it is completely enclosed in the treated fabric, then zip the pouch closed, or secure bottom edge of protector with stitched gathered elastic.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC. THIS TAG IS NOT TO BE REMOVED EXCEPT BY CONSUMER.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn inside apparel:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs.
Insecticidal activity remains
Effective up to 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No. 0840978-CHN-001

Discard in Trash.

Wash separately.

Refer to hang tag for more
information.

PRODUCT PERFORMANCE / EFFICACY REVIEW

Mark Suarez, Entomologist - IB

Handwritten signature: Mark ES
18 March 2009

DATE: 18 March 2009

EPA REG. NUMBER: 83122-1

PRODUCT NAME: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

REGISTRANT: Garnik Industries Inc.

PM: PM13

REVIEWER: Olga Odiott

DECISION #.: 397129

DP BARCODE: 359726

ACTION: R340

ACTIVE INGREDIENT(S): 1009701, Permethrin.....0.52%

TYPE: Fabric Treatment

OPPTS GUIDELINE(S): 810.3000

MRID: 47484601 Submitted GLP? No.

SITES & PESTS Fabric Bed Bugs

LABEL APPLICATION RATES: 0.52% fabric

AI APPLICATION RATES: 0.52% fabric

STUDY APPLICATION RATES: 0.52% fabric

STUDY SUMMARIES:

MRID 47484601. Gaynor, W. (2008) Efficacy of Pro-Tek 50, A Permethrin-Impregnated Fabric, For Killing Bed Bugs. Project Number: 427/0030, 427/0032, 427/0033. Unpublished study prepared by ICR, Inc. 47 p.

The data submitted were generated from a laboratory study in which the target species, bed bugs, were forced to contact a fabric covered surface for 24 hours. Ten replicates each of treated fabric, unlaundered fabric, treated fabric that had been laundered 25 times, untreated, unlaundered fabric, and untreated fabric laundered 25 times were run. After 24 hours, the insects were moved to clean jars lined with untreated paper towel. Control mortality over the 48 hour trial was within acceptable parameters.

The results of the experiment are reported below.

Treatment	Washes	% Permethrin	% Mortality	
			24	48
Treated fabric	0	0.48	100	99
Treated fabric	20	--	100	87.7
Treated fabric (sized)	20	--	100	32.8
Treated fabric	25	0.28	100	98.0

ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

The registrant provided a revised label for the application to add bed bugs to the label of Pro-Tek 50 Fabric/Apparel Garment Treatment. The proposed labeling includes claims against bed bugs when the fabric is used to manufacture bed bands, dust ruffles, headboard backing, or box spring protectors, but excludes claims on apparel or garments.

These claims are generally acceptable, but must be qualified on the labeling.

1. The items must be produced without the addition of sizing or other fabric treatments.
2. The label must state that use of fabric treatments will reduce the effectiveness of the product.
3. The products must be made entirely of treated fabric, stitching, elastic, and zippers excluded.
4. The products must clearly state on the front panel that the product will kill bed bugs that remain in contact with treated fabric for at least 24 hours.
5. Marketing claims proposed are addressed below. Comments are in *italics* and additions to the marketing text are underlined.
 - a. Kills bed bugs that [live][remain][stay] in contact with treated [bed band][dust ruffle][headboard backing][box spring protector]
 - b. Bed bugs come out to feed on human hosts – *acceptable statement of fact*
 - c. Bed bugs typically feed at night– *acceptable statement of fact*
 - d. Bed bugs may hide in your back board and lay eggs – *should this read headboard?*
 - e. Blood taken from humans is the food of bed bugs– *acceptable statement of fact*
 - f. Bed bugs bites may cause welts which become irritated, inflamed and itchy– *acceptable statement of fact*
 - g. Bed bugs colonies may cause offensive odors– *acceptable statement of fact*

STUDY SUMMARIES:

MRID 47484601. Gaynor, W. (2008) Efficacy of Pro-Tek 50, A Permethrin-Impregnated Fabric, For Killing Bed Bugs. Project Number: 427/0030, 427/0032, 427/0033. Unpublished study prepared by ICR, Inc. 47 p.

The data submitted were generated from a laboratory study in which the target species, bed bugs, were forced to contact a fabric covered surface for 24 hours. Ten replicates each of treated fabric, unlaundered fabric, treated fabric that had been laundered 25 times, untreated, unlaundered fabric, and untreated fabric laundered 25 times were run. After 24 hours, the insects were moved to clean jars lined with untreated paper towel. Control mortality over the 48 hour trial was within acceptable parameters.

The results of the experiment are reported below.

Treatment	Washes	% Permethrin	% Mortality	
			24	48
Treated fabric	0	0.48	100	99
Treated fabric	20	--	100	87.7
Treated fabric (sized)	20	--	100	32.8
Treated fabric	25	0.28	100	98.0

ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

The registrant provided a revised label for the application to add bed bugs to the label of Pro-Tek 50 Fabric/Apparel Garment Treatment. The proposed labeling includes claims against bed bugs when the fabric is used to manufacture bed bands, dust ruffles, headboard backing, or box spring protectors, but excludes claims on apparel or garments.

These claims are generally acceptable, but must be qualified on the labeling.

1. The items must be produced without the addition of sizing or other fabric treatments.
2. The label must state that use of fabric treatments will reduce the effectiveness of the product.
3. The products must be made entirely of treated fabric, stitching, elastic, and zippers excluded.
4. The products must clearly state on the front panel that the product will kill bed bugs that remain in contact with treated fabric for at least 24 hours.
5. Marketing claims proposed are addressed below. Comments are in italics and additions to the marketing test are underlined.
 - a. Kills bed bugs that [live][remain][stay] in contact with treated [bed band][dust ruffle][headboard backing][box spring protector]
 - b. Bed bugs come out to feed on human hosts – *acceptable statement of fact*
 - c. Bed bugs typically feed at night– *acceptable statement of fact*
 - d. Bed bugs may hide in your back board and lay eggs – *should this read headboard?*
 - e. Blood taken from humans is the food of bed bugs– *acceptable statement of fact*
 - f. Bed bugs bites may cause welts which become irritated, inflamed and itchy– *acceptable statement of fact*
 - g. Bed bugs colonies may cause offensive odors– *acceptable statement of fact*

PRODUCT PERFORMANCE / EFFICACY REVIEW

Mark Suarez, Entomologist - IB

DATE: 18 March 2009

EPA REG. NUMBER: 83122-1
PRODUCT NAME: Pro-Tek 50 Fabric/Apparel (Garment) Treatment
REGISTRANT: Garnik Industries Inc.

PM: PM13
REVIEWER: Olga Odiott

DECISION #.: 397129
DP BARCODE: 359726
ACTION: R340

ACTIVE INGREDIENT(S): 1009701, Permethrin.....0.52%

TYPE: Fabric Treatment

OPPTS GUIDELINE(S): 810.3000

MRID: 47484601 Submitted GLP? No.

SITES & PESTS Fabric Bed Bugs

LABEL APPLICATION RATES: 0.52% fabric

AI APPLICATION RATES: 0.52% fabric

STUDY APPLICATION RATES: 0.52% fabric

- h. Female bed bugs can lay over 200 eggs in their lifetime– *acceptable statement of fact*
- i. Newly hatched bed bugs begin feeding immediately– *acceptable statement of fact*
- j. Be bugs have a piercing beak– *acceptable statement of fact*
- k. Treated fabric has no odor and is washable up to 20 times
- l. Kills bed bugs between your box spring and mattress – *(for Box Spring Protector and Dust ruffle only)*
- m. Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds – *This claim must be modified to include the italicized text*
- n. “New” – *for up to 6 months from the date of first distribution*
- o. Kills bed bugs that [live][remain][stay] in contact with treated [bed band][dust ruffle][headboard backing][box spring protector]. Insecticidal (killing) action remains effective for up to 20 washings.

Enclosure
083122-00001 S841573-ER

- h. Female bed bugs can lay over 200 eggs in their lifetime– *acceptable statement of fact*
- i. Newly hatched bed bugs begin feeding immediately– *acceptable statement of fact*
- j. Be bugs have a piercing beak– *acceptable statement of fact*
- k. Treated fabric has no odor and is washable up to 20 times
- l. Kills bed bugs between your box spring and mattress – *(for Box Spring Protector and Dust ruffle only)*
- m. Kills bed bugs that hide in contact with treated headboard backing in your headboard corners, frame and folds – *This claim must be modified to include the italicized text*
- n. “New” – *for up to 6 months from the date of first distribution*
- o. Kills bed bugs that [live][remain][stay] in contact with treated [bed band][dust ruffle][headboard backing][box spring protector]. Insecticidal (killing) action remains effective for up to 20 washings.

Enclosure
083122-00001 S841573-ER

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

Please reply to:

ICR, Inc.
1330 Dillon Heights Avenue
Baltimore, MD 21228-1199

Telephone: 410-747-4500
Telefax: 410-747-4928
Email: ContactICR@icrlab.com

December 5, 2008

Ms. Olga Odiott
Team 13
Document Processing Desk (AMEND)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, Virginia 22202

Subject: Amendment of Product Label –Decision 39719 (R340)
PRO-TEK 50 Fabric/Apparel (Garment) Treatment
EPA Registration Number: 83122-1

Dear Ms. Odiott:

Garnik Industries, LLC is providing the following for your review:

1. Revised draft label with the suggestions made by Mark Suarez in the Product Performance/Efficacy Review of 6 November 2008, as well as those of the 24th of November teleconference with you, Mr. Suarez, Kevin Sweeney and Kim Nesci. Under cover of this letter we are providing 5 hardcopies of this label with the changes highlighted, along with 5 copies of the original draft label for comparison purposes, for the PR Notice 86-5 screening process. The copies will be delivered to EPA on Monday, December 8th. We will also be providing these labels by email.
2. Untreated prototypes of the protector bedding will be provided under separate cover:
 - a. Bed Band: At least 8 inches wide, which wraps around all four sides of a mattress. The band is secured by Velcro® sewn (at both ends) or other means.

- b. Dust Ruffle: Covers the top of a box spring or foundation beneath a mattress. It is a "flat" to which a drop skirt or ruffle has been sewn so that the skirt of ruffle hangs from the edge of the box spring to the flooring beneath on all four sides of the box spring or foundation. (Please note that the sample has a drop skirt only on three sides; however, retail products will be four-sided.)
- c. Headboard Backing: A two-sided quilted or 'fused' fabric attached to the back of a headboard by tacks or glue.
- d. Box Spring Protector model A: Covers the top and sides of the box spring and is secured by gathered elastic stitched along the edge of the protector. There is also a model B (see label for description)

The treated fabric kills any bed bugs that contact these protective bed coverings.

We understand that this submission will not trigger an additional PRIA II Fee; however, the date by which EPA will make a decision is extended to March 24, 2009.

Should you require additional information or have questions concerning this submission, please do not hesitate to contact me at 410-747-4500 or by email via RTodd@icrlab.com. In my absence, please contact Ms. Rachida Djebel (RDjebel@icrlab.com).

Sincerely yours,



~~Robin G. Todd, PhD, BCE~~
Technical Consultant & Agent for Garnik Industries, LLC

Enclosures: as above

Cc: G. Innocenti, W. Ball, & J. Erdheim

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs (NOT FOR USE AGAINST BED BUGS AS APPAREL OR GARMENTS)

♦ **FOUR TREATED FABRIC PRODUCTS WHICH
KILL BED BUGS ON & AROUND BEDS**

1. Bed Band

Band of hemmed, treated fabric that wraps around all four sides of a mattress (band is 8 inches or wider depending on mattress thickness). Band is sewn along all four sides. Band is secured around mattress by Velcro® or other means at each end of band.

2. Dust Ruffle

Fabric section (a 'flat') covers top of box spring or foundation, beneath the mattress. Sewn to this flat is a drop or skirt that hangs from all four sides to the floor. The standard drop or skirt is 15 inches, but custom sizes are available to service market requirements.

3. Headboard Backing

Two-sided fabric formed by quilting or fusing technologies. Backing is attached to the back of the headboard by tacking or glue or is installed during manufacture. Several sizes are available.

4. Box Spring Protector

-Model A: Treated fabric covers top and sides of the box spring and is secured by gathered elastic stitched along the edge of the protector.

-Model B: The treated fabric is a pouch with a zipper along one side. The box spring is placed inside and zipped closed.

- ◆ Kills bed bugs
 - ◆ Bed bugs come out to feed on human hosts
 - ◆ Bed bugs typically feed at night
 - ◆ Bed bugs may hide in your back board and lay eggs
 - ◆ Blood taken from humans is the food of bed bugs
 - ◆ Bed bug bites may cause welts which become irritated, inflamed and itchy
 - ◆ Bed bug colonies may cause offensive odors
 - ◆ Female bed bugs can lay over 200 eggs in their lifetime
 - ◆ Newly hatched bed bugs begin feeding immediately
 - ◆ Bed bugs have a piercing beak
 - ◆ Treated fabric has no odor and is washable
 - ◆ Kills bed bugs between your box-spring and mattress
 - ◆ Kills bed bugs that hide in your headboard corners, frame and folds
 - ◆ “New” (for allowable time frame)
- Kills bed bugs. Insecticidal (killing) action remains effective for up to 20 washings.

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment Hang Tag

Hang Tag on Outside of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs. Insecticidal (killing) action remains effective through 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective for 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio or umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %


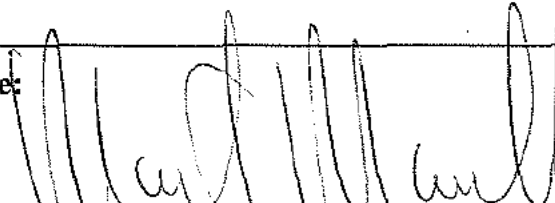
Manufactured by:

Garnik Industries, LLC

219 Scott Street, # 182

Beaufort, SC 29902-5554

logged in
OPR ~ 11/28/08

Recommendation of Division Directors Negotiated Due Dates		
Decision#: 397129	Registration#: 83122-1	Petition #: N/A
Fee Category: R340	PRIA Decision Time Frame: 4 months	
Submitted by: Olga Odiott	Branch: IB	Date: 11/24/2008
Company: Garnik Industries, LLC		
Original Due Date: 11/28/2008	Proposed New Due Date: 03/24/2009	
Previous Negotiated Due Dates: N/A		
Is the "Fix" in-house? No	If not, date "Fix" expected: 12/8/2008	
Issue (describe in detail): The efficacy reviewer concluded that the submitted data and the labeling are not adequate to support the desired label claims for reasons ranging from improper study design to vague labeling/directions for use.		
Summary of Deficiency Type(s): Not Submitted (N) or Deficiencies (D) Product Chemistry: ___ Acute Tox: ___ Efficacy: (D) ___ Labeling: (D) ___ Other (describe): ___		
Describe Interactions with Company (describe when contacted and company's response including response to previous negotiated due dates): A copy of the efficacy data review and feedback concerning the proposed label claims was sent to the Registrant. The registrant was also contacted via teleconference (November 24, 2008) to discuss the data/label deficiencies. The registrant agreed to provide additional information and revised labeling and to extend the PRIA due date. The registrant also agreed to submit the required information/revised labeling within 2 weeks (by December 8, 2008).		
"75-Day" Letter sent? ___ Yes ___X___ No and reason for none? Registrant agreed to submit "fix"-type information by December 8, 2008		
Rationale for Proposed Due Date: To allow sufficient time for submission and review of additional data to support the proposed product registration.		
Registrant notified that this is the last negotiation? ___ Yes ___X___ Not Applicable		
Approve: 	Disapprove:	
If disapproved, action to be taken:		
OD or DOD Signature: 	Date: 11-28-08	



<rtodd@icrlab.com>
11/24/2008 03:36 PM

To: Olga Odiott/DC/USEPA/US@EPA
cc: "Ellen Quinn" <EQuinn@icrlab.com>, "Rachida Djebel"
<RDjebel@icrlab.com>, "Bill Ball - Garnik"
<hhlabs@embarqmail.com>, "Gary Innocenti"
bcc:
Subject: PRO-TEK 50 Fabric- bed bug claim

Dear Ms. Odiott,

Thank you very much for arranging this afternoon's teleconference regarding the proposed bed bug label claims for the PRO-TEK 50 Fabric/Apparel(Garment) Treatment (EPA Reg. No 83122-1) with Mark Suarez, Kevin Sweeney and Kim Nesci.

We agree that this label needs to be revised to clearly describe the product(s) and the directions for use. We also need to revise the claims so that they are in line with the available data. As your group suggested, we would therefore like to renegotiate the PRIA II due date (currently 11/20/08) to obtain a 4-month extension to 3/24/09. Within two weeks (i.e. by 12/8/08) we will submit an appropriately revised label and cover letter (hard copy and electronic versions). We were pleased to learn that no additional PRIA II fees will be due.

Please do not hesitate to contact me, Rachida Djebel or Ellen Quinn if you have any questions.

Regards,

Robin
Robin G. Todd PhD BCE
Agent
Garnik Industries, LLC
c/o 1330 Dillon Heights Avenue
Baltimore, MD 21228-1199
USA

tel. 410-747-4500
fax. 410-747-4928
webpage: www.icrlab.com



<rtodd@icrlab.com>
11/24/2008 03:36 PM

To: Olga Odiott/DC/USEPA/US@EPA
cc: "Ellen Quinn" <EQuinn@icrlab.com>, "Rachida Djebel"
<RDjebel@icrlab.com>, "Bill Ball - Garnik"
<hhllabs@embarqmail.com>, "Gary Innocenti"
bcc:
Subject: PRO-TEK 50 Fabric- bed bug claim

Dear Ms. Odiott,

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Please do not hesitate to contact me, Rachida Djebel or Ellen Quinn if you have any questions.

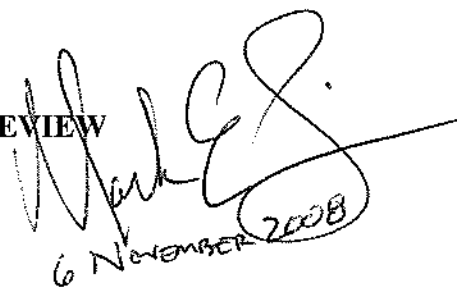
Regards,

Robin
Robin G. Todd PhD BCE
Agent
Garnik Industries, LLC
c/o 1330 Dillon Heights Avenue
Baltimore, MD 21228-1199
USA

tel. 410-747-4500
fax. 410-747-4928
webpage: www.icrlab.com

PRODUCT PERFORMANCE / EFFICACY REVIEW

Mark Suarez, Entomologist - IB


6 November 2008

DATE: 6 November 2008

EPA REG. NUMBER: 83122-1
PRODUCT NAME: Pro-Tek 50 Fabric/Apparel (Garment) Treatment
REGISTRANT: Garnik Industries Inc.

PM: PM13
REVIEWER: Olga Odiott

DECISION #.: 397129
DP BARCODE: 355983
ACTION: R340

ACTIVE INGREDIENT(S): 1009701, Permethrin.....0.52%

TYPE: Fabric Treatment

OPPTS GUIDELINE(S): 810.3000

MRID: 47484601 Submitted GLP? No.

SITES & PESTS Fabric Bed Bugs

LABEL APPLICATION RATES: 0.52% fabric

AI APPLICATION RATES: 0.52% fabric

STUDY APPLICATION RATES: 0.52% fabric

STUDY SUMMARIES:

MRID 47484601. Gaynor, W. (2008) Efficacy of Pro-Tek 50, A Permethrin-Impregnated Fabric, For Killing Bed Bugs. Project Number: 427/0030, 427/0032, 427/0033. Unpublished study prepared by ICR, Inc. 47 p.

The data submitted were generated from a laboratory study in which the target species, bed bugs, were forced to contact a fabric covered surface for 24 hours. Ten replicates each of treated, unlaundered fabric fabric, treated fabric that had been laundered 25 times, untreated, unlaundered fabric, and untreated fabric laundered 25 times were run. After 24 hours, the insects were moved to a clean jars lined with untreated paper towel. Control mortality over the 48 hour trial was within acceptable parameters.

The results of the experiment are reported below.

Treatment	Washes	% Permethrin	% Mortality	
			24	48
Treated fabric	0	0.48	100	99
Treated fabric	20	--	100	87.7
Treated fabric (sized)	20	--	100	32.8
Treated fabric	25	0.28	100	98.0

ENTOMOLOGIST'S COMMENTS AND RECOMMENDATIONS:

The data submitted do not support the desired label amendment. There are several reasons for this: (1) The experimental design used was inadequate to demonstrate that the product will provide adequate performance when uses according to the label directions for use. (2) The label is too vague. Any number of products could be produced, which would not have a reasonable expectation of providing the necessary product performance. (3) The proposed labeling included bed bugs language for inappropriate use site (apparel).

Although the data provided are not acceptable and none of the desired label claims against bed bugs will be approved at this time, it is possible to provide feedback on some of the desired label claims. Specific label claims are presented, with comment, below:

1. Kills bed bugs! – May be supported by appropriate data
2. Treated Bed Bug Band fabric wraps around the sides of mattresses to prevent bed bugs from crawling up onto the mattress – May be supported by appropriate data
3. ~~Treated Box Spring cover prevents bed bugs from crawling up onto the mattress. Mattress is NOT treated.~~ – Not acceptable, as bed bugs can access the mattress from many points
4. Treated Dust Ruffle hangs from sides of box spring to the floor to prevent bed bugs from crawling up onto the mattress. – May be supported by appropriate data
5. Treated Headboard Backing ~~provides protection from~~ kills bed bugs hiding behind the headboard
6. ~~This product used in conjunction with other available bed bug control systems will promote a cleaner sleep environment~~ – Unacceptable claim, even with submission of data supporting claims against bed bug.
7. ~~Promotes a safer sleeping environment~~ – Unacceptable claim, even with submission of data supporting claims against bed bug.

8. Good for 20 washes – May be supported by appropriate data
9. Kills bed bug eggs ~~where they hide~~ – Eggs don't hide
10. ~~No human contact with treated fabric~~
11. Bed bugs come out to feed on human hosts – acceptable
12. Bed bugs *generally* feed at night – typically at night, but not always
13. Bed bugs may hide in your back board and lay eggs – acceptable
14. Blood taken from humans is the ~~favorite~~ food of bed bugs
15. Bed bug bites may cause welts which become irritated, inflamed and itchy – acceptable
16. Bed bug colonies may cause offensive odors – acceptable
17. Female bed bugs can lay over 200 eggs in their lifetime – acceptable
18. ~~Non-dusting formula~~ – Comparative claim
19. Newly hatched eggs begin to feed immediately – acceptable
20. Bed bugs have a piercing beak - acceptable
21. ~~Bed bug infestation is a world wide problem~~
22. ~~Promotes a cleaner sleeping environment~~ – Unacceptable claim, even with submission of data supporting claims against bed bug.
23. Treated fabric has no odor and is washable – defer to PM
24. ~~No re-application necessary~~ - Misleading
25. ~~Kills bed bugs before the bite~~ – Enhanced efficacy claim
26. Bed bugs may hide in your carpeting and travel to your bed to feed – May be supported by appropriate data
27. ~~Bed bugs get their name because they are associated with bedding~~
28. ~~Keeps bed bugs from crawling on your bed~~ – Misleading
29. ~~Entomologists world wide have noticed a recent upsurge in bed bugs~~ – Unacceptable claim, even with submission of data supporting claims against bed bug.
30. ~~Bed bugs hide in corners of mattresses and box-springs~~ – Misleading
31. Kills bed bugs between your box-spring and mattress – May be supported by appropriate data
32. Kills bed bugs that hide in your headboard corners, frame and folds – May be supported by appropriate data
33. "New" (for allowable time frame) – *6 months from dated of first distribution*
34. Kills bed bugs that may crawl on your bed – Misleading
35. Kills bed bugs. Insecticidal (killing) action remains effective ~~through~~ *for up to 20* washings.
36. ~~When used to protect bedding from bed bugs, no additional repellent product is necessary.~~ – Misleading.

Master Label Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label Claims for Bed Bugs

♦ **KILLS BED BUGS!**

♦ **NO INTENTIONAL HUMAN CONTACT**

-Treated Bed Bug Band fabric wraps around the sides of mattresses to prevent bed bugs from crawling up onto the mattress

-Treated Box-Spring cover prevents bed bugs from crawling up onto the mattress. Mattress is NOT treated.

-Treated Dust Ruffle hangs from sides of box spring to the floor to prevent bed bugs from crawling up onto the mattress

-Treated Headboard Backing provides protection from bed bugs hiding behind the headboard

- ♦ This product used in conjunction with other available bed bug control systems will promote a cleaner sleep environment
- ♦ Promotes a safer sleeping environment
- ♦ Good for 20 Washes
- ♦ Kills bed bug eggs where they hide
- ♦ No human contact with the treated fabric
- ♦ Bed bugs come out to feed on human hosts
- ♦ Bed bugs feed at night
- ♦ Bed bugs may hide in your back board and lay eggs
- ♦ Blood taken from humans is the favorite food of bed bugs
- ♦ Bed bug bites may cause welts which become irritated, inflamed and itchy
- ♦ Bed bug colonies may cause offensive odors
- ♦ Female bed bugs can lay over 200 eggs in their lifetime
- ♦ Non-dusting formula
- ♦ Newly hatched eggs begin feeding immediately
- ♦ Bed bugs have a piercing beak
- ♦ Bed bug infestation is a world wide problem
- ♦ Promotes a cleaner sleeping environment
- ♦ Treated fabric has no odor and is washable
- ♦ No re-application necessary
- ♦ Kills bed bugs before they bite
- ♦ Bed bugs may hide in your carpeting and travel to your bed to feed
- ♦ Bed bugs get their name because they are associated with bedding
- ♦ Keeps bed bugs from crawling on your bed
- ♦ Entomologists world wide have noticed a recent upsurge in bed bugs

- ◆ Bed bugs hide in corners of mattresses and box-springs
- ◆ Kills bed bugs between your box-spring and mattress
- ◆ Kills bed bugs that hide in your headboard corners, frame and folds
- ◆ “New” (for allowable time frame)
- ◆ Kills bed bugs that may crawl on your bed

*Master Label **Pro-Tek 50 Fabric/Apparel (Garment) Treatment** Hang Tag*

Hang Tag on Outside of Apparel/Fabric (May be removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This [fabric]/[apparel] (garment) has been treated with **PRO-TEK 50 Fabric/Apparel (Garment) Treatment** that contains the active ingredient permethrin.

[Kills Bed Bugs. Insecticidal (killing) action remains effective through 20 washings.]

[Repels Mosquitoes, Ticks, Flies, Chiggers, and Midges. Repellency remains effective through 25 washings.]

[Repellency remains effective through 25 washings for washable items: outerwear garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), and pet bandanas.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio or umbrella covers, kennel covers, and stall covers.]

DO NOT DRY CLEAN

EPA Reg. No. 83122-1
EPA Establishment No.

Active Ingredient:	
Permethrin	0.52 %
Other Ingredients:	<u>99.48 %</u>
Total	100.00 %

REGISTRANT:

Garnik Industries, LLC
219 Scott Street, # 182
Beaufort, SC 29902-5554

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat product with other permethrin insect repellent products.

[To protect skin exposed to treated apparel also use an insect repellent (which is approved for application to skin) to the exposed skin.]

[When used to protect bedding from bed bugs, no additional repellent product is necessary.]

Wash this product separately from other fabrics or apparel. Do not dry clean, as dry cleaning will remove the active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

[RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL OR FABRIC. THIS TAG IS NOT TO BE REMOVED EXCEPT BY CONSUMER.]

Master Apparel Label: Pro-Tek 50 Fabric/Apparel (Garment) Treatment

Label (small tag) sewn inside apparel:

**PRO-TEK 50
Fabric/Apparel (Garment)
Treatment**

Do Not Dry Clean

[Kills Bed Bugs.
Insecticidal activity remains
effective through 20 washings]

[Repels Mosquitoes, Ticks,
Flies, Chiggers,
and Midges]

[Repellency remains
effective
through 25 washings]

----- (fold line) -----

Active Ingredient:
Permethrin 0.52 %

EPA Reg. No. 83122-1
EPA Est. No.

Discard in Trash.

Wash separately.

Refer to hang tag for more
information.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

MAR 11 2008

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

Mr. William L. Ball
Garnik Industries LLC
182 B Sea Island Parkway, PMB #558
Beaufort, SC 29907

Subject: Application to Add Use Sites as per Me-too Products
Change Brand Name to PRO-TEK 50 Fabric/Apparel (Garment) Treatment

PRO-TEK 50 Apparel (Garment) Treatment
EPA Reg. No. 83122-1
Your submission dated November 14, 2007

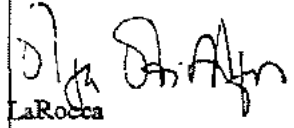
Dear Mr. Ball:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Delete the comma between "Outerwear" and "garments". Use for underwear garments is not permitted.
2. Delete "sleeping bags systems". This can imply use on items other than sleeping bags covers.
3. Submit a formulators exemption statement (EPA Form 8570-27) confirming that you purchased a registered source of active ingredient. This form is required to be submitted when adding new uses to the label.
4. Please note that a notice of availability of EPA's reregistration eligibility document (RED) for products containing permethrin was published in the FR on June 28, 2006 (Vol. 71 No. 124 pg. 36788). Additional data and/or labeling changes may be required for products containing permethrin.

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,


George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Enclosure

Master Label

Hang Tag on Outside of Fabric/Apparel/ Garment (removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with **PRO-TEK 50**
Fabric/Apparel (Garment) treatment containing the insect repellent permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers and Midges
Repellency remains effective through 25 washings

[Repellency remains effective for 25 washings for washable items: Outerwear, garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), pet bandanas, sleeping bag systems.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers.]

DO NOT DRYCLEAN

EPA Reg. No. 83122-1

EPA Establishment No. XXXX-XX-XXX

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries

182B Sea Island Pkwy, P.O. Box #558.

Beaufort, SC 29907

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric/apparel (garment) with other permethrin insect repellent products. For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

Wash separately from other clothing. Do not dry clean. Dry cleaning removes active ingredient.

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAR 11 2008

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.

83122-1

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS FABRIC/APPAREL (GARMENT). THIS TAG NOT TO BE REMOVED EXCEPT BY CONSUMER.

Neither Gamik Industries nor any other protection product can guarantee complete protection from insects, insect bites, or related reactions or diseases.

Master Label

Label sewn inside apparel

PRO-TEK 50

Fabric/Apparel (Garment)

Treatment

Do not Dry Clean

Repels mosquitoes, Ticks,

Flies, Chiggers,
and Midges.

Repellency remains
effective

through 25 washings

----- (fold line) -----

Active Ingredient:

Permethrin 0.52 %

EPA Reg. No. 83122-1

EPA Est. No. XXX-XX-XXX

Discard in Trash

Wash separately.

Refer to hang tag for more
information.

MATERIAL TO BE ADDED TO JACKET

REG # 83122-1

Description: Change Brand Name,

add new uses

check all that apply	
<input checked="" type="checkbox"/>	new stamped accepted label
<input type="checkbox"/>	new CSF
<input type="checkbox"/>	notification

Send to CSC

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's Name: Olga Odio

Date: March 11, 2008

Phone: 308-9369

Division: RD/IB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAR 11 2008

Mr. William L. Ball
Garnik Industries LLC
182 B Sea Island Parkway, PMB #558
Beaufort, SC 29907

Subject: Application to Add Use Sites as per Me-too Products
Change Brand Name to PRO-TEK 50 Fabric/Apparel (Garment) Treatment

PRO-TEK 50 Apparel (Garment) Treatment
EPA Reg. No. 83122-1
Your submission dated November 14, 2007

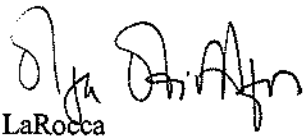
Dear Mr. Ball:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable subject to the comments listed below. Two (2) copies of the finished labeling must be submitted prior to releasing the product for shipment. A stamped copy of the label is enclosed for your records.

1. Delete the comma between "*Outerwear*" and "*garments*". Use for underwear garments is not permitted.
2. Delete "*sleeping bags systems*". This can imply use on items other than sleeping bags covers.
3. Submit a formulators exemption statement (EPA Form 8570-27) confirming that you purchased a registered source of active ingredient. This form is required to be submitted when adding new uses to the label.
4. Please note that a notice of availability of EPA's reregistration eligibility document (RED) for products containing permethrin was published in the FR on June 28, 2006 (Vol. 71 No. 124 pg. 36788). Additional data and/or labeling changes may be required for products containing permethrin.

If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,


George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Enclosure

Master Label

Hang Tag on Outside of Fabric/Apparel/ Garment (removed by consumer after purchase)

PRO-TEK 50

Fabric/Apparel (Garment) Treatment

This fabric/apparel (garment) has been treated with PRO-TEK 50

Fabric/Apparel (Garment) treatment containing the insect repellent permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers and Midges

Repellency remains effective through 25 washings

[Repellency remains effective for 25 washings for washable items: Outerwear, garments, sleeping bag covers, backpacks, decorative banners, outdoor furniture covers, outdoor furniture cushions, patio umbrellas, outdoor carpeting, ground cloths, horse blankets, bed netting, domestic animal care products (pet bedding, pet blankets and netting), pet bandanas, sleeping bag systems.]

[Repellency to mosquitoes remains effective for 6 months of exposure to weathering for non-washable items: tents, tarps, awnings, patio umbrella covers, kennel covers, stall covers.]

DO NOT DRYCLEAN

EPA Reg. No. 83122-1

EPA Establishment No. XXXX-XX-XXX

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

ACCEPTED
with COMMENTS
In EPA Letter Dated
MAR 11 2008
Under the Federal Insecticide,
Fungicide, and Rodenticide Act
as amended, for the pesticide
registered under EPA Reg. No.
83122-1

Manufactured by:

Garnik Industries

182B Sea Island Pkwy, PMB #558.

Beaufort, SC 29907

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric/apparel (garment) with other permethrin insect repellent products. For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.

Wash separately from other clothing. Do not dry clean. Dry cleaning removes active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS
FABRIC/APPAREL (GARMENT). THIS TAG NOT TO BE REMOVED EXCEPT BY CONSUMER.

Neither Garnik Industries nor any other protection product can guarantee complete
protection from insects, insect bites, or related reactions or diseases.

Master Label

Label sewn inside apparel

PRO-TEK 50

Fabric/Apparel (Garment)

Treatment

Do not Dry Clean

Repels mosquitoes, Ticks,
Flies, Chiggers,
and Midges.

Repellency remains
effective

through 25 washings

----- (fold line) -----

Active Ingredient:

Permethrin 0.52 %

EPA Reg. No. 83122-I

EPA Est. No. XXX-XX-XXX

Discard in Trash

Wash separately.

Refer to hang tag for more
information.

Decision Information for 83122-1

Decision Seq: 388220
Action Code: 810, ADDITIONAL USE, TECHNICAL, ME-TOO, 90

Decision Status
Tracking
Create Resubmission
FFS Letters
Waiver Documentation

FFS Start Date
Due Date: 12-Mar-2008
OPP Target Due Dt:
Negotiated Due Dt:
Registrant:
Response Due Date:
Current Status: PENDING (08-Jan-2008)

Tentative Ind: No
FFS Original Decision:
FFS EUP Decision:
FFS Sect3 Decision:
Start/Stop Clock
FOPA Clock:
Days Elapsed:

Decision Comments
Payment
Unmodified Payments
Meetings & Milestones
FFS Information
FFS Negotiated Due Dates
OPP Target Due Date
Decision Ownership
Receipts
Data Package
Reduced Risk

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S: 821419	Odrott, Olga	83122-1	12-Mar-2008	PENDING
Pesticide amendment and Fast Track-No-Fee; add same uses as on me-too products; 81041-1 and 82008-1				

Regina Foushe
EPA-PRISM
9:53 AM

EPA Reg. Number: <u>83122-1</u>		EPA Receipt Date: <u>12/13/07</u>		
	Check List Item	Yes	No	NA
1	Application Form (EPA Form 8570-1) -signed?	X		
2	Confidential Statement of Formula (EPA Form 8570-29) - signed?			X
3	Certification with Respect to Citation of Data (EPA Form 8570-34) signed?	X		
4	Formulator's Exemption Statement (EPA Form 8570-27) - signed?			X
5	Data Matrix (EPA Form 8570-35) [Applicable, for adding me-too uses]	X		
	a) Selective Method?	X		
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay	X		
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	Is Label Included? (5 copies)	X		
Comments:				

Fee for Service

{821419.~

This package includes the following

- ☐ New Registration
- ☒ Amendment

☐ Studies? ☐ Fee Waiver?
☐ volpay % Reduction: ____

for Division

- ☐ AD
- ☐ BPPD
- ☒ RD

Risk Mgr. 13

Receipt No.

S-

821419

EPA File Symbol/Reg. No.

83122-1

Pin-Punch Date:

12/13/2007



This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: \$ _____

Parent/Child Decisions:

☐ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: J. Miller

Date: 12/14/07

Remarks:



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

December 17, 2007

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

WILLIAM L. BALL
GARNIK INDUSTRIES, LLC
182 B SEA ISLAND PARKWAY, PMB #558
BEAUFORT, SC 29907-

PRODUCT NAME: PRO-TEK 50 FABRIC TREATMENT
COMPANY NAME: GARNIK INDUSTRIES, LLC
EPA FILE SYMBOL: 83122-1
EPA RECEIPT DATE: 12/13/07

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 13, at (703) 305-6100.

Sincerely, *J. Wrice*
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

GARNICK INDUSTRIES, LLC
182B SEA ISLAND PARKWAY, PMB #558
BEAUFORT, SC 29907
843-379-5200; FAX 843-589-9262

November 14, 2007

Document Processing Desk (AMEND)
Registration Division
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

ATTN: George LaRocca, Product Manager # 13, Insecticide Branch

SUBJECT: APPLICATION FOR PESTICIDE AMENDMENT –
Fast Track – No Fee
Submission of Revised Labeling to add use sites from similar product registrations
PRO-TEK 50 Fabric/Apparel (Garment) Treatment; EPA Reg. No. 83122-1

Dear Mr. LaRocca:

Enclosed, please find the following materials in support of the above-subject application for pesticide amendment:

1. Application for Pesticide Amendment
2. Certification with Respect to Citation of Data
3. Data Matrix
4. Five copies of draft labeling
5. One marked copy of labeling to show changes

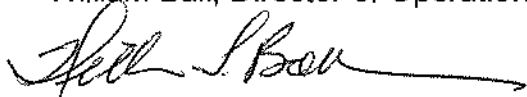
We are using the "cite-all" method of data support. This product is substantially similar to Expel; EPA Reg. No. 81041-1 and Eastman Insect Repellent Gear; EPA Reg. No. 82108-1.

At this time, we are requesting a change in primary brand name from PRO-TEK 50 Apparel (Garment) Treatment to PRO-TEK 50 Fabric/Apparel (Garment) Treatment. The addition of fabrics for uses other than clothing necessitates this change.

If you need additional information or have any questions regarding this submission, please do not hesitate to contact me at (843) 379-5200. See Attached Enclosures.

Sincerely,

William Ball, Director of Operations





United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☒ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83122-1	2. EPA Product Manager George LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PRO-TEK 50 Fabric/Apparel (Garment) Treatment	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Gamik Industries, LLC 182B Sea Island Parkway, PMB #558 Beaufort, SC 29907 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 81041-1 & 82108-1 Product Name Expel & Eastman Insect Repellent Gear	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

FAST TRACK AMENDMENT - NO FEE

Addition of other types of fabric products to labeling - "Cite-all" method of data support

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____		
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)				
Name William Ball		Title Director of Operations		
		Telephone No. (Include Area Code) (843) 379-5200		
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.			6. Date Application Received (Stamped) 	
2. Signature 		3. Title Director of Operations		
4. Typed Name William Ball		5. Date November 14, 2007		

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

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Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Garnik Industries, LLC, 182B Sea Island Pkwy, PMB #558, Beaufort, SC 29907 (843) 379-5200	EPA Registration Number/File Symbol 83122-1
Active Ingredient(s) and/or representative test compound(s) Permethrin	Date November 14, 2007
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Domestic Outdoor, Indoor	Product Name PRO-TEK 50 Fabric/Apparel (Garment) Treatment

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

<input checked="" type="checkbox"/> I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	<input type="checkbox"/> I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).
---	--

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

Date

Nov. 13, 2007

Typed or Printed Name and Title

William Ball / Director of Operations



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date	November 14, 2007	EPA Reg No./File Symbol	83122-1	Page	1 of 3
Applicant's/Registrant's Name & Address	Garnik Industries, LLC 182B Sea Island Parkway, PMB #558 Beaufort, SC 29907	Product	PRO-TEK 50 Fabric/Apparel (Garment) Treatment		

Ingredient Permethrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
61-1/830.1550	Chemical Identity	See CSF	Garnik Industries	OWN	
61-2/830.1600 & 1650	Beginning Materials & Manufacturing Process	See CSF	Garnik Industries	OWN	
61-3/830.1670	Discussion of Formation of Impurities	See 83122-1	Garnik Industries	OWN	
62-1/830.1700	Preliminary Analysis	NA			NA - not an integrated system
61-2/830.1750	Certification of Ingredients Limits	See CSF	Garnik Industries	OWN	
61-3/830.1800	Analytical Method to Verify Certified Limits		See Attached Data Submitters List	PAY	
63-2/830.6302	Color	NA			NA - PRN 92-5
63-3/830.6303	Physical State		See Attached Data Submitters List	PAY	
63-4/830.6304	Odor	NA			NA - PRN 92-5
63-5/830.7200	Melting Point	NA			NA - end-product
63-6/830.7220	Boiling Point	NA			NA - end-product
63-7/830.7300	Density, Bulk Density or Specific Gravity	See CSF	Garnik Industries	OWN	
63-8/830.7840 & 830.7860	Solubility	NA			NA - end-product
63-9/830.7950	Vapor Pressure	NA			NA - end-product
63-10/830.7370	Dissociation Constant	NA			NA - end-product

Signature

Name and Title

William Ball / Director of Operations

Date

Nov. 14, 2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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DATA MATRIX

Date	November 14, 2007	EPA Reg No./File Symbol	83122-1	Page	2 of 3
Applicant's/Registrant's Name & Address	Garnik Industries, LLC 182B Sea Island Parkway, PMB #558 Beaufort, SC 29907	Product	PRO-TEK 50 Fabric/Apparel (Garment) Treatment		

Ingredient Permethrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
63-11/830.7570	Octanol Water Partition Coefficient	NA			NA - end-product
63-12/830.7000	pH	NA			NA - not dispersible with water
63-13/830.6313	Stability	NA			NA - end-product
63-14/830.6314	Oxidizing/Reducing Action	NA			NA - contains no oxidizing or reducing agents
63-15/830.6315	Flammability	NA			NA - contains no combustible liquids
63-16/830.6316	Explosibility	NA			NA - contains no explosive ingredients
63-17/830.6717	Storage Stability	cite-all	See Attached Data Submitters List	PAY	
63-18/830.7100	Viscosity	NA			NA - solid
63-19/830.6319	Miscibility	NA			NA - solid
63-20/830.6320	Corrosion Characteristics	cite-all	See Attached Data Submitters List	PAY	
63-21/830.6321	Dielectric Breakdown Voltage	NA			NA - not for use around electrical equipment +
81-1/870.1100	Acute Oral Toxicity	cite-all	See Attached Data Submitters List	PAY	
81-2/870.1200	Acute Dermal Toxicity	cite-all	See Attached Data Submitters List	PAY	
81-3/870.1300	Acute Inhalation Toxicity	cite-all	See Attached Data Submitters List	PAY	
81-4/870.2400	Primary Eye Irritation	cite-all	See Attached Data Submitters List	PAY	

Signature		Name and Title	William Ball / Director of Operations	Date	Nov. 14, 2007
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Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date November 14, 2007

EPA Reg No./File Symbol 83122-1

Page 3 of 3

Applicant's/Registrant's Name & Address	Gamik Industries, LLC 1828 Sea Island Parkway, PMB #558 Beaufort, SC 29907
---	--

Product
PRO-TEK 50 Fabric/Apparel (Garment) Treatment

Ingredient	Permethrin
------------	------------

[illegible]

Signature

Lee J. Ball

Name and Title
William Ball / Director of Operations

Date
Nov. 14, 2007

* DATA TYPES *	PO BOX 10129
EU AT EC FW EF OT	GREENSBORO, NC 27404
XX XX	
COMPANY# 074888	RESIDENTIAL EXPOSURE JOINT VENTURE (REJV)
* DATA TYPES *	900 17TH STREET, NW, SUITE 300
EU AT EC FW EF OT	WASHINGTON, DC 20006
XX	
COMPANY# 074896	REGGUIDE
* DATA TYPES *	509 TOWER VALLEY DRIVE
EU AT EC FW EF OT	HILLSBORO, MO 63050
XX	
COMPANY# 075101	ARCH WOOD PROTECTION, INC.
* DATA TYPES *	Agent for: KOPPERS ARCH WOOD PROTECTION
EU AT EC FW EF OT	1955 LAKE PARK DRIVE, SUITE 100
XX	SMYRNA, GA 30080
COMPANY# 075131	SCIREG, INC.
* DATA TYPES *	Agent for: NOTABLE SOLUTIONS, LLC
EU AT EC FW EF OT	12733 DIRECTOR'S LOOP
XX	WOODBIDGE, VA 22192
COMPANY# 075234	AGRICULTURAL HANDLERS EXPOSURE TASK FORCE
* DATA TYPES *	PO BOX 509
EU AT EC FW EF OT	MACON, MO 63552
XX	
COMPANY# 075497	NOVA BIOGENETICS, INC.
* DATA TYPES *	8601 DUNWOODY PLACE, SUITE 338
EU AT EC FW EF OT	ATLANTA, GA 30350
XX	
COMPANY# 075844	TECHNOLOGY SCIENCES GROUP INC.
* DATA TYPES *	Agent for: ANDREW M MARTIN CO. NV. INC.
EU AT EC FW EF OT	4061 N 156TH DR
XX	GOODYEAR, AZ 85338
COMPANY# 079676	GRO-PRO, LLC
* DATA TYPES *	D/B/A ET1GRA
EU AT EC FW EF OT	501 CASCADE POINTE LANE, SUITE 103
XX XX	CARY, NC 27513
COMPANY# 080203	STARENSIER, INC.
* DATA TYPES *	PO BOX 408
EU AT EC FW EF OT	NEWBURYPORT, MA 01950
XX XX	
COMPANY# 081041	HEALTH & ENVIRONMENTAL HORIZONS, LTD.
* DATA TYPES *	Agent for: BIKEI INTERNATIONAL, INC.
EU AT EC FW EF OT	2851 SOUTH HAVEN RD
XX	ANNAPOLIS, MD 21401
COMPANY# 081402	TRAVELER'S SUPPLY, INC.
* DATA TYPES *	2024 R WESTOVER ROAD
EU AT EC FW EF OT	CHICOPEE, MA 01022
XX	
COMPANY# 082108	EASTERN CHEMICAL, LLC
* DATA TYPES *	C/O BUZZ OFF INSECT SHIELD, LLC
EU AT EC FW EF OT	PO BOX 10129
XX	GREENSBORO, NC 27404
COMPANY# 082123	PRODUCT & REGULATORY ASSOCIATES, LLC
* DATA TYPES *	Agent for: ALLERGY TECHNOLOGIES, LLC
EU AT EC FW EF OT	PO BOX 1683
XX XX	VOORHEES, NJ 08043
COMPANY# 082392	HENRY JACOBY REGULATORY CONSULTANT

* DATA TYPES *	17-17 ROUTE 208
EU AT EC FW EF OT	FAIR LAWN, NJ 074102821
XX	
COMPANY# 073223	NON-DIETARY EXPOSURE TASK FORCE (NDETF)
* DATA TYPES *	1900 K STEET, NW
EU AT EC FW EF OT	WASHINGTON, DC 200061108
XX	
COMPANY# 073510	REGISTRATIONS BY DESIGN, INC.
* DATA TYPES *	Agent for: MARKETQUEST INC.
EU AT EC FW EF OT	118 1/2 E MAIN ST, SUITE 1
XX XX	SALEM, VA 24153
COMPANY# 073579	A.N.T.S. RESEARCH & DEVELOPMENT CORP.
* DATA TYPES *	PO BOX 1717
EU AT EC FW EF OT	BRECKENRIDGE, TX 76424
XX	
COMPANY# 073607	IDC COMPANY
* DATA TYPES *	PO BOX 271
EU AT EC FW EF OT	ALTAMONTE SPRINGS, FL 32701
XX	
COMPANY# 073617	PRO PRODUCTS
* DATA TYPES *	36 SPLIT ROCK ROAD
EU AT EC FW EF OT	MAHOPAC, NY 10541
XX XX	
COMPANY# 073745	LEWIS & HARRISON
* DATA TYPES *	Agent for: NIX, INC.
EU AT EC FW EF OT	122 C ST NW STE 740
XX	WASHINGTON, DC 20001
COMPANY# 073748	UNIVAR USA INC
* DATA TYPES *	11149 RESEARCH BLVD., SUITE 260
EU AT EC FW EF OT	AUSTIN, TX 78759
XX	
COMPANY# 073876	TRAVEL MEDICINE
* DATA TYPES *	369 PLEASANT STREET
EU AT EC FW EF OT	NORTHAMPTON, MA 01060
XX	
COMPANY# 073989	FIFRA ENDANGERED SPECIES TASK FORCE, L.L.C.
* DATA TYPES *	1350 I STREET, NW
EU AT EC FW EF OT	WASHINGTON, DC 20005
XX	
COMPANY# 074405	OSMOSE NEW ZEALAND
* DATA TYPES *	980 ELLICOTT STREET
EU AT EC FW EF OT	BUFFALO, NY 14209
XX	
COMPANY# 074621	THE BUG STOMPER OF LA., INC.
* DATA TYPES *	PO BOX 704
EU AT EC FW EF OT	SPRINGHILL, LA 71075
XX XX	
COMPANY# 074627	PRODUCT & REGULATORY ASSOCIATES, L.L.C.
* DATA TYPES *	PO BOX 1683
EU AT EC FW EF OT	VOORHEES, NJ 08043
XX	
COMPANY# 074785	BIO-PLANET PRODUCTS
* DATA TYPES *	4943-A WAA STREET
EU AT EC FW EF OT	HONOLULU, HI 96821
XX	
COMPANY# 074843	BUZZ OFF INSECT SHIELD, LLC

* DATA TYPES *	13001 ST. CHARLES ROCK RD
EU AT EC FW EF OT	BRIDGETON, MO 63044
XX	
COMPANY# 067603	SHERWIN-WILLIAMS DIVERSIFIED BRANDS
* DATA TYPES *	101 PROSPECT AVE.
EU AT EC FW EF OT	CLEVELAND, OH 44115
XX	
COMPANY# 068543	BENGAL PRODUCTS INC
* DATA TYPES *	13739 AIRLINE HWY
EU AT EC FW EF OT	BATON ROUGE, LA 70817
XX XX	
COMPANY# 070506	UNITED PHOSPHORUS, INC
* DATA TYPES *	630 FREEDOM BUSINESS CENTER, SUITE 402
EU AT EC FW EF OT	KING OF PRUSSIA, PA 19406
XX	
COMPANY# 070907	GHARDA USA, INC
* DATA TYPES *	660 NEWTOWN-YARDLEY RD., SUITE 105
EU AT EC FW EF OT	NEWTOWN, PA 18940
XX XX	
COMPANY# 071280	PREMIUM ENVIRONMENTAL PRODUCTS, LLC
* DATA TYPES *	90 ROXBURY ROAD
EU AT EC FW EF OT	PLANTVILLE, CT 06479
XX XX	
COMPANY# 071532	BIOLOGIC, INC.
* DATA TYPES *	Agent for: LG LIFE SCIENCES, LTD.
EU AT EC FW EF OT	115 OBTUSE HILL ROAD
XX	BROOKFIELD, CT 06804
COMPANY# 071720	RIAP CHEMICAL FACTORY
* DATA TYPES *	801 BOVEE LANE
EU AT EC FW EF OT	BOVEE, OH 43065
XX XX	
COMPANY# 071754	OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE, L.L.C.
* DATA TYPES *	1350 I STREET, N.W.
EU AT EC FW EF OT	WASHINGTON, DC 20005
XX	
COMPANY# 071755	AGRICULTURAL REENTRY TASK FORCE
* DATA TYPES *	1350 I STREET, N.W.
EU AT EC FW EF OT	WASHINGTON, DC 20005
XX	
COMPANY# 072155	BAYER ADVANCED
* DATA TYPES *	A BUSINESS UNIT OF BAYER CROPSCIENCE LP
EU AT EC FW EF OT	PO BOX 12014
XX	RESEARCH TRIANGLE PARK, NC 27709
COMPANY# 072567	PLEXUS SERVICES, INC.
* DATA TYPES *	PO BOX 271
EU AT EC FW EF OT	ALTAMONTE SPRINGS, FL 32701
XX	
COMPANY# 072969	STAR HORSE PRODUCTS INC.
* DATA TYPES *	4061 N 156TH DR
EU AT EC FW EF OT	GOODYEAR, AZ 85338
XX	
COMPANY# 073049	VALENT BIOSCIENCES CORPORATION
* DATA TYPES *	870 TECHNOLOGY WAY, SUITE 100
EU AT EC FW EF OT	LIBERTYVILLE, IL 60048
XX XX XX	
COMPANY# 073154	SAPSTAIN INDUSTRY GROUP (SIG) - (CONSORTIUM)

CHEMICAL	CHEMICAL NAME
109701	Permethrin, mixed cis,trans
COMPANY# 000004	BONIDE PRODUCTS, INC.
* DATA TYPES *	6301 SUTLIFF ROAD
EU AT EC FW EF OT	ORISKANY, NY 13424
XX	
COMPANY# 000059	COOPERS ANIMAL HEALTH INC
* DATA TYPES *	421 EAST HAWLEY ST
EU AT EC FW EF OT	MUNDELEIN, IL 60060
XX XX	
COMPANY# 000100	SYNGENTA CROP PROTECTION, INC.
* DATA TYPES *	ATTN: REGULATORY AFFAIRS
EU AT EC FW EF OT	PO BOX 18300
XX	GREENSBORO, NC 27419
COMPANY# 000149	DELTA ANALYTICAL CORP
* DATA TYPES *	Agent for: SENORET CHEMICAL CO INC
EU AT EC FW EF OT	12510 PROSPERITY DRIVE, SUITE 160
XX	SILVER SPRINGS, MD 20904
COMPANY# 000239	THE ORTHO BUSINESS GROUP
* DATA TYPES *	D/B/A THE SCOTTS COMPANY
EU AT EC FW EF OT	PO BOX 190
XX	MARYSVILLE, OH 43040
COMPANY# 000270	FARNAM COMPANIES INC
* DATA TYPES *	PO BOX 34820
EU AT EC FW EF OT	PHOENIX, AZ 85067
XX XX	
COMPANY# 000279	FMC CORP. AGRICULTURAL PRODUCTS GROUP
* DATA TYPES *	1735 MARKET ST
EU AT EC FW EF OT	PHILADELPHIA, PA 19103
XX XX XX XX XX	
COMPANY# 000358	NOTT PRODUCTS CO. INC.
* DATA TYPES *	PO BOX 975
EU AT EC FW EF OT	CORAM, NY 11727
XX	
COMPANY# 000400	CHEMTURA CORPORATION
* DATA TYPES *	199 BENSON ROAD (2-4)
EU AT EC FW EF OT	MIDDLEBURY, CT 06749
XX	
COMPANY# 000432	BAYER ENVIRONMENTAL SCIENCE
* DATA TYPES *	A BUSINESS GROUP OF BAYER CROPSCIENCE LP
EU AT EC FW EF OT	PO BOX 12014
XX XX	RESEARCH TRIANGLE PARK, NC 27709
COMPANY# 000478	REALEX
* DATA TYPES *	DIV OF UNITED INDUSTRIES CORP
EU AT EC FW EF OT	PO BOX 142642
XX	ST LOUIS, MO 63114
COMPANY# 000498	CHASE PRODUCTS CO
* DATA TYPES *	PUTTING THE BEST AT YOUR FINGERTIPS
EU AT EC FW EF OT	PO BOX 70
XX	MAYWOOD, IL 60153
COMPANY# 000499	WHITMIRE MICRO-GEN RESEARCH LABORATORIES INC
* DATA TYPES *	3568 TREE CT INDUSTRIAL BLVD
EU AT EC FW EF OT	ST LOUIS, MO 63122
XX XX	
COMPANY# 000550	UNIVAR USA INC.

* DATA TYPES *	ATTN:REGULATORY AFFAIRS
EU AT EC FW EF OT	PO BOX 34325
XX	SEATTLE, WA 98124
COMPANY# 000655	PRENTISS INC
* DATA TYPES *	C.B. 2000
EU AT EC FW EF OT	FLORAL PARK, NY 11001
XX	
COMPANY# 000769	VALUE GARDENS SUPPLY, LLC
* DATA TYPES *	D/B/A VALUE GARDEN SUPPLY
EU AT EC FW EF OT	PO BOX 385
XX XX	SAINT JOSEPH, MO 64502
COMPANY# 000773	SCHERING-PLOUGH ANIMAL HEALTH CORPORATION
* DATA TYPES *	556 MORRIS AVENUE, BUILDING S4-3
EU AT EC FW EF OT	SUMMIT, NJ 07901
XX XX XX XX XX	
COMPANY# 000829	SOUTHERN AGRICULTURAL INSECTICIDES, INC.
* DATA TYPES *	PO BOX 218
EU AT EC FW EF OT	PALMETTO, FL 34220
XX	
COMPANY# 000869	GREEN LIGHT COMPANY
* DATA TYPES *	PO BOX 17985
EU AT EC FW EF OT	SAN ANTONIO, TX 78217
XX	
COMPANY# 001021	MCLAUGHLIN GORMLEY KING CO
* DATA TYPES *	8810 TENTH AVE NORTH
EU AT EC FW EF OT	MINNEAPOLIS, MN 55427
XX XX	
COMPANY# 001022	IBC MANUFACTURING CO
* DATA TYPES *	C/O GAIL EARLY
EU AT EC FW EF OT	416 E. BROOKS ROAD
XX XX	MEMPHIS, TN 38109
COMPANY# 001327	FULLER SYSTEM, INC.
* DATA TYPES *	PO BOX 3053
EU AT EC FW EF OT	WOBURN, MA 01888
XX	
COMPANY# 001543	W.F. YOUNG, INC.
* DATA TYPES *	302 BENTON DRIVE
EU AT EC FW EF OT	EAST LONGMEADOW, MA 01028
XX	
COMPANY# 002217	PBI/GORDON CORP
* DATA TYPES *	PO BOX 014090
EU AT EC FW EF OT	KANSAS CITY, MO 64101
XX XX	
COMPANY# 002382	VIRBAC AH, INC.
* DATA TYPES *	JOSEPH E. DYER - REGULATORY AGENT
EU AT EC FW EF OT	3200 MEACHAM BLVD.
XX XX XX	FORT WORTH, TX 76137
COMPANY# 002517	REGGUIDE
* DATA TYPES *	Agent for: SERGEANT'S PET CARE PRODUCTS,
EU AT EC FW EF OT	509 TOWER VALLEY DRIVE
XX XX	HILLSBORO, MO 63050
COMPANY# 002596	THE HARTZ MOUNTAIN CORP.
* DATA TYPES *	ATTN: ROBERT ROSENWASSER
EU AT EC FW EF OT	400 PLAZA DRIVE
XX XX XX	SECAUCUS, NJ 07094
COMPANY# 002724	WELLMARK INTERNATIONAL

* DATA TYPES *	1501 E. WOODFIELD ROAD, SUITE 200 WEST
EU AT EC FW EF OT	SCHAUMBURG, IL 60173
XX XX XX	
COMPANY# 002781	HAPPY JACK INC
* DATA TYPES *	PO BOX 475
EU AT EC FW EF OT	SNOW HILL, NC 28580
XX	
COMPANY# 002791	MILLER W C CHEM CO
* DATA TYPES *	3314 HOUSTON AVE
EU AT EC FW EF OT	HOUSTON, TX
XX XX XX XX XX	
COMPANY# 003546	LYNWOOD LABS INC
* DATA TYPES *	945 GREAT PLAIN AVE.
EU AT EC FW EF OT	NEEDHAM, MA 02192
XX	
COMPANY# 003862	ABC COMPOUNDING CO, INC
* DATA TYPES *	PO BOX 16247
EU AT EC FW EF OT	ATLANTA, GA 30321
XX	
COMPANY# 004691	BOEHRINGER INGELHEIM VETMEDICA, INC.
* DATA TYPES *	PO BOX 338
EU AT EC FW EF OT	ELWOOD, KS 66024
XX XX	
COMPANY# 004758	PET CHEMICALS
* DATA TYPES *	PO BOX 18993
EU AT EC FW EF OT	MEMPHIS, TN 381810993
XX	
COMPANY# 004822	S.C. JOHNSON & SON INC.
* DATA TYPES *	1525 HOWE STREET
EU AT EC FW EF OT	RACINE, WI 53403
XX	
COMPANY# 005481	AMVAC CHEMICAL CORPORATION
* DATA TYPES *	D/B/A AMVAC
EU AT EC FW EF OT	4695 MACARTHUR COURT, SUITE 1250
XX XX XX	NEWPORT BEACH, CA 92660
COMPANY# 006218	SUMMIT CHEMICAL CO
* DATA TYPES *	SUMMIT RESPONSIBLE SOLUTIONS
EU AT EC FW EF OT	235 S KRESSON STREET
XX	BALTIMORE, MD 21224
COMPANY# 006959	CESSCO INC
* DATA TYPES *	3609A RIVER RD
EU AT EC FW EF OT	JOHNS ISLAND, SC 29455
XX	
COMPANY# 007056	IQ PRODUCTS CO
* DATA TYPES *	ATTN: MARTY YORK
EU AT EC FW EF OT	16212 STATE HWY 249
XX	HOUSTON, TX 77086
COMPANY# 007401	VOLUNTARY PURCHASING GROUPS, INC.
* DATA TYPES *	PO BOX 460, 230 FM 87
EU AT EC FW EF OT	BONHAM, TX 75418
XX XX	
COMPANY# 008329	CLARKE MOSQUITO CONTROL PRODUCTS INC
* DATA TYPES *	159 N GARDEN AVE
EU AT EC FW EF OT	ROSELLE, IL 60172
XX XX	
COMPANY# 008660	UNITED INDUSTRIES CORP.

* DATA TYPES *	D/B/A SYLORR PLANT CORP.
EU AT EC FW EF OT	PO BOX 142642
XX XX	ST. LOUIS, MO 63114
COMPANY# 008848	SAFEGUARD CHEMICAL CORP
* DATA TYPES *	411 WALES AVE
EU AT EC FW EF OT	BRONX, NY 10454
XX	
COMPANY# 009404	H.R. MCLANE, INC.
* DATA TYPES *	Agent for: SUNNILAND CORP
EU AT EC FW EF OT	7210 RED ROAD, SUITE 206A
XX	MIAMI, FL 33143
COMPANY# 009591	REGGUIDE
* DATA TYPES *	Agent for: NATIONWIDE CHEMICAL PRODUCTS
EU AT EC FW EF OT	509 TOWER VALLEY DRIVE
XX	HILLSBORO, MO 63050
COMPANY# 009688	CHEMSICO
* DATA TYPES *	DIV OF UNITED INDUSTRIES CORP
EU AT EC FW EF OT	PO BOX 142642
XX XX XX	ST LOUIS, MO 63114
COMPANY# 009816	FIEBING COMPANY, INC.
* DATA TYPES *	Agent for: FIEBING COMPANY, INC.
EU AT EC FW EF OT	PO BOX 694
XX	MILWAUKEE, WI 53201
COMPANY# 010182	SYNGENTA CROP PROTECTION
* DATA TYPES *	410 SWING ROAD
EU AT EC FW EF OT	GREENSBORO, NC 27409
XX XX XX XX XX	
COMPANY# 011474	SUNGRO CHEMICALS, INC.
* DATA TYPES *	PO BOX 24632
EU AT EC FW EF OT	LOS ANGELES, CA 90024
XX	
COMPANY# 011556	BAYER HEALTHCARE LLC
* DATA TYPES *	ANIMAL HEALTH DIVISION
EU AT EC FW EF OT	PO BOX 390
XX XX XX	SHAWNEE MISSION, KS 66201
COMPANY# 011656	WESTERN FARM SERVICE, INC
* DATA TYPES *	ATTN: DUNYA HAPROFF-FONDSE
EU AT EC FW EF OT	PO BOX 1168
XX	FRESNO, CA 93715
COMPANY# 011715	SPEER PRODUCTS INC
* DATA TYPES *	4242 B.F. GOODRICH BOULEVARD
EU AT EC FW EF OT	MEMPHIS, TN 381810993
XX	
COMPANY# 011930	GIL MFG INC.
* DATA TYPES *	PO BOX 242725
EU AT EC FW EF OT	MONTGOMERY, AL 36124
XX	
COMPANY# 015297	BRAZOS ASSOCIATES, INC.
* DATA TYPES *	Agent for: BIO-DERM LABORATORIES INC
EU AT EC FW EF OT	1806 AUBURN DRIVE
XX	CARROLLTON, TX 75007
COMPANY# 020954	SANDOZ AGRO INC
* DATA TYPES *	1300 EAST TOUHY AVE
EU AT EC FW EF OT	DES PLAINES, IL 60018
XX	
COMPANY# 021165	BRAZOS ASSOCIATES, INC.

* DATA TYPES *	Agent for: PYRANHA, INC.
EU AT EC FW EF OT	1806 AUBURN DRIVE
XX XX	CARROLLTON, TX 75007
COMPANY# 028293	PHAETON CORPORATION
* DATA TYPES *	D/B/A/ UNICORN LABORATORIES
EU AT EC FW EF OT	PO BOX 290
XX	MADISON, GA 30650
COMPANY# 033657	LANDIS INTERNATIONAL, INC.
* DATA TYPES *	Agent for: MITSUI CHEMICALS, INC.
EU AT EC FW EF OT	PO BOX 5126
XX XX	VALDOSTA, GA 31603
COMPANY# 035138	AEROCHEM, INC.
* DATA TYPES *	1396 LEE LANE
EU AT EC FW EF OT	RAYMOND, MS 39154
XX	
COMPANY# 039039	Y-TEX CORPORATION
* DATA TYPES *	PO BOX 1450
EU AT EC FW EF OT	CODY, WY 82414
XX	
COMPANY# 040208	DRUMMOND AMERICAN CORPORATION
* DATA TYPES *	600 CORPORATE WOODS PARKWAY
EU AT EC FW EF OT	VERNON HILLS, IL 60061
XX	
COMPANY# 040849	ENFORCER PRODUCTS
* DATA TYPES *	A DIVISION OF ACUITY SPECIALTY PRODUCTS
EU AT EC FW EF OT	1420 SEABOARD INDUSTRIAL BOULEVARD
XX	ATLANTA, GA 30318
COMPANY# 042697	SAFER, INC.
* DATA TYPES *	A WHOLLY OWNED SUBSIDIARY OF WOODSTREAM
EU AT EC FW EF OT	69 NORTH LOCUST STREET
XX	LITITZ, PA 17543
COMPANY# 044446	QUEST CHEMICAL CORPORATION
* DATA TYPES *	12255 F.M. 529 NORTHWOODS INDUSTRIAL PARK
EU AT EC FW EF OT	HOUSTON, TX 77041
XX	
COMPANY# 045385	H.R. MCLANE, INC.
* DATA TYPES *	Agent for: CTX-CENOL, INC.
EU AT EC FW EF OT	7210 RED ROAD, SUITE 206A
XX	MIAMI, FL 33143
COMPANY# 045600	INSECTA MARKETING, INC.
* DATA TYPES *	3601 NE 5TH AVE
EU AT EC FW EF OT	OAKLAND PARK, FL 33334
XX	
COMPANY# 045735	BURLINGTON SCIENTIFIC CORPORATION
* DATA TYPES *	71 CAROLYN BLVD.
EU AT EC FW EF OT	FARMINGDALE, NY 11735
XX	
COMPANY# 046813	REGWEST COMPANY LLC
* DATA TYPES *	Agent for: K-G PACKAGING, INC.
EU AT EC FW EF OT	30856 ROCKY ROAD
XX	GREELEY, CO 80631
COMPANY# 047000	STEVEN E. ROGOSHESKE
* DATA TYPES *	Agent for: CHEM-TECH LTD
EU AT EC FW EF OT	1479 W POND RD
XX	EAGAN, MN 55122
COMPANY# 048139	HILTON HEAD LABORATORIES INC

* DATA TYPES *	182 B SEA ISLAND PARKWAY, PMB #558
EU AT EC FW EF OT	BEAUFORT, SC 29907
XX	
COMPANY# 050404	SCIENTIFIC COORDINATION, INC.
* DATA TYPES *	Agent for: COULSTON PRODUCTS INC
EU AT EC FW EF OT	4629 CHERRY VALLEY DRIVE
XX XX XX	ROCKVILLE, MD 20853
COMPANY# 051036	BASF SPARKS LLC
* DATA TYPES *	PO BOX 13528
EU AT EC FW EF OT	RESEARCH TRIANGLE PARK, NC 27709
XX	
COMPANY# 052142	LHB INDUSTRIES
* DATA TYPES *	10440 TRENTON AVENUE
EU AT EC FW EF OT	ST. LOUIS, MO 63132
XX	
COMPANY# 053263	LEWIS & HARRISON
* DATA TYPES *	Agent for: COGNIS CORPORATION
EU AT EC FW EF OT	122 C ST., NW, SUITE 740
XX	WASHINGTON, DC 20001
COMPANY# 053883	CONTROL SOLUTIONS, INC.
* DATA TYPES *	5903 GENOA-RED BLUFF
EU AT EC FW EF OT	PASADENA, TX 77507
XX	
COMPANY# 055431	RUSTY MILLAR
* DATA TYPES *	Agent for: ARIZONA CHEMICAL GROUP INC.
EU AT EC FW EF OT	850 MICHELTORENA STREET
XX	LOS ANGELES, CA 90026
COMPANY# 055809	CRC INDUSTRIES, INC.
* DATA TYPES *	885 LOUIS DRIVE
EU AT EC FW EF OT	WARMINSTER, PA 18974
XX	
COMPANY# 059639	VALENT U.S.A. CORPORATION
* DATA TYPES *	Agent for: VALENT U.S.A. CORPORATION
EU AT EC FW EF OT	1101 14TH STREET, NW, SUITE 1050
XX	WASHINGTON, DC 20005
COMPANY# 062451	LINEGUARD INC
* DATA TYPES *	ATTN: E. H. ROBERTS
EU AT EC FW EF OT	PO BOX 839
XX	ELYRIA, OH 44036
COMPANY# 063823	MANAGEMENT CONTRACT SERVICES, INC.
* DATA TYPES *	PO BOX 5209
EU AT EC FW EF OT	VALDOSTA, GA 31603
XX	
COMPANY# 066330	ARYSTA LIFESCIENCE NORTH AMERICA CORPORATION
* DATA TYPES *	15401 WESTON PARKWAY, SUITE 150
EU AT EC FW EF OT	CARY, NC 27513
XX	
COMPANY# 066607	SPRAY DRIFT TASK FORCE
* DATA TYPES *	1900 K STREET, NW
EU AT EC FW EF OT	WASHINGTON, DC 20006
XX	
COMPANY# 067505	ECTO DEVELOPMENT CORP
* DATA TYPES *	1229 N JESSE JAMES RD
EU AT EC FW EF OT	EXCELSIOR SPRINGS, MO 64024
XX XX	
COMPANY# 067517	PM RESOURCES INC

* DATA TYPES * Agent for: PINEBELT PROCESSING, INC.
EU AT EC FW EF OT 6709 ILEX COURT
XX XX NEW MARKET, MD 21774

COMPANY# 082534 SUMMIT AGRO (USA) CORPORATION
* DATA TYPES * 600 THIRD AVENUE
EU AT EC FW EF OT NEW YORK, NY 10016
XX

COMPANY# 083399 SUMMIT VETPHARM, LLC
* DATA TYPES * PARKER PLAZA, 400 KELBY STREET
EU AT EC FW EF OT FORT LEE, NJ 07024
XX XX XX XX

COMPANY# 083588 INTERNATIONAL TEXTILE GROUP, INC.
* DATA TYPES * 804 GREEN VALLEY ROAD, SUITE 300
EU AT EC FW EF OT GREENSBORO, NC 27408
XX

COMPANY# 083795 HEATHER R. BJORNSON
* DATA TYPES * Agent for: CALLINGTON HAVEN PTY LTD
EU AT EC FW EF OT 1150 18TH STREET, NW, SUITE 1000
XX XX WASHINGTON, DC 20036

CHEMICAL 109702 CHEMICAL NAME
Cypermethrin

COMPANY# 000059 COOPERS ANIMAL HEALTH INC
* DATA TYPES * 421 EAST HAWLEY ST
EU AT EC FW EF OT MUNDELEIN, IL 60060
XX XX

COMPANY# 000100 SYNGENTA CROP PROTECTION, INC.
* DATA TYPES * ATTN: REGULATORY AFFAIRS
EU AT EC FW EF OT PO BOX 18300
XX GREENSBORO, NC 27419

COMPANY# 000270 FARNAM COMPANIES INC
* DATA TYPES * PO BOX 34820
EU AT EC FW EF OT PHOENIX, AZ 85067
XX

COMPANY# 000279 FMC CORP. AGRICULTURAL PRODUCTS GROUP
* DATA TYPES * 1735 MARKET ST
EU AT EC FW EF OT PHILADELPHIA, PA 19103
XX XX XX XX

COMPANY# 000498 CHASE PRODUCTS CO
* DATA TYPES * PUTTING THE BEST AT YOUR FINGERTIPS
EU AT EC FW EF OT PO BOX 70
XX MAYWOOD, IL 60153

COMPANY# 001021 McLAUGHLIN GORMLEY KING CO
* DATA TYPES * 8810 TENTH AVE NORTH
EU AT EC FW EF OT MINNEAPOLIS, MN 55427
XX XX

COMPANY# 004561 CEREXAGRI, INC.
* DATA TYPES * 630 FREEDOM BUSINESS CENTER, SUITE 402
EU AT EC FW EF OT KING OF PRUSSIA, PA 19406
XX

COMPANY# 004822 S.C. JOHNSON & SON INC.
* DATA TYPES * 1525 HOWE STREET
EU AT EC FW EF OT RACINE, WI 53403
XX XX XX

COMPANY# 005905 HELENA CHEMICAL CO
* DATA TYPES * 225 SCHILLING BOULEVARD, SUITE 300
EU AT EC FW EF OT COLLIERSVILLE, TN 38017



Environmental Protection Agency

Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

83122-1

Distributor Company Number

2596

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Pro-Tek 50 Garment Treatment

Distributor Product Name

Hartz Bugdana For Dogs Only

Name and Address of Distributor (Type; include ZIP code)

The Hartz Mountain Corporation
400 Plaza Drive
Secaucus, NJ 07094-3688

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Date

[Signature], Director, Regulatory Affairs

1/24/07

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Date

[Signature], President

1/24/07



United States
Environmental Protection Agency
Office of Pesticide Programs (7505C)
Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product
83122-1

Distributor Company Number
2596

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)
Pro-Tek 50 Garment Treatment

Distributor Product Name
Hartz Bugdana For Dogs Only

Name and Address of Distributor (Type; include ZIP code)

The Hartz Mountain Corporation
400 Plaza Drive
Secaucus, NJ 07094-3688

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary.
4. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..." or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Date

[Signature], Director, Regulatory Affairs

1/24/07

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Date

[Signature], Partner

1/24/07


 United States
 Environmental Protection Agency

Office of Pesticide Programs (7505C)

Washington, DC 20460

 Notice of Supplemental Distribution of a Registered Pesticide Product
 1235-2
Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

83122-1

Distributor Company Number

2596

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

Bio-Tek-50 Fabric Treatment

Distributor Product Name

Hartz Bugdana

Name and Address of Distributor (Type; include ZIP code)

 Hartz Mountain Corporation
 400 Plaza Drive
 Secaucus, New Jersey 07094-3688
Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Date

11/17/2006

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

Date

11/20/2006

United States



Environmental Protection Agency

Office of Pesticide Programs (7505C)

Washington, DC 20460

Notice of Supplemental Distribution of a Registered Pesticide Product

Instructions

After a registrant has obtained final registration for the basic product, the registrant may then supplementally distribute his/her product. One form must be submitted for each distributor product and must be signed by the distributor involved. The basic registration number and the distributor company number must be shown.

If a registrant has a potential distributor who does not have a company number assigned, she/he should have the distributor apply, on letterhead stationery, to the Registration Division to have a number assigned prior to submitting this form to the agency.

This Notice of Supplemental Distribution must be submitted by the basic registrant. The completed form must have the concurrence and signature of both the registrant and the distributor.

EPA Registration Number of Product

83122-1

Distributor Company Number

2596

Note: Do not submit distributor product labels

Name of Registered Product (basic product name accepted by EPA)

o-Tek-50 Fabric Treatment

Distributor Product Name

Hartz Bugdana

Name and Address of Distributor (Type; include ZIP code)

Hartz Mountain Corporation
400 Plaza Drive
Secaucus, New Jersey 07094-3688

Read All Conditions Before Signing

1. The distributor product must have the same composition as the basic product.
2. The distributor product must be manufactured and packaged by the same person who manufactures and packages the registered basic product.
3. The labeling for the distributor product must bear the same claims as the basic product, provided, however, that specific claims may be deleted if by doing so, no other changes to the label are necessary. The product must remain in the manufacturer's unbroken container.
5. The label must bear the EPA registration number of the basic product, followed by a hyphen and the distributor's company number.
6. Distributor product labels must bear the name and address of the distributor qualified by such terms as "packed for...", "distributed by..."; or "sold by..." to show that the name is not that of the manufacturer.
7. All conditions of the basic registration apply equally to distributor products. It is the responsibility of the basic registrant to see that all distributor labeling is kept in compliance with requirements placed on the basic product.

Distributor

We intend to market our product under the Distributor Product Name specified above, subject to the conditions specified on this Notice.

Signature and Title of Distributor

Joseph L. Se. Director Regulatory

Date

Nov. 17, 2006

Registrant

I agree that the distributor named above may distribute and sell the Distributor Product specified above, subject to the conditions specified on this Notice.

Signature and Title of Registrant

John L. Ball, General Partner

Date

11/20/2006

MATERIAL TO BE ADDED TO JACKET

REG #

83122-1

Description:

ALTERNATE CONFIDENTIAL STATEMENT OF FORMULA
(CSF)

<i>check all that apply</i>	
<input type="checkbox"/>	new stamped accepted label
<input checked="" type="checkbox"/>	new CSF
<input type="checkbox"/>	notification

Send to CSC

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's
Name:

George LaRocca

Date: Nov 4, 2007

Phone:

305-6100

Division:

RD/IB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

DEC 4 2007

William L. Ball
Garnik Industries, LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907

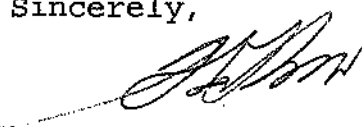
Subject: Amendment/Alternate Source of Active Ingredient
Pro-Tek 50 Fabric Treatment
EPA Reg. No. 83122-1
Your application dated November 5, 2007

Dear Mr. Ball:

The alternate Confidential Statement of Formula (CSF) dated November 1, 2007 is acceptable and has been placed in the file for the subject product. This CSF replaces the alternate CSF dated July 7, 2007.

If you have any questions in regard to this letter please contact me at (703) 305-6100.

Sincerely,


George T. LaRocca
Product Manager (13)
Registration Division
Insecticide Branch (7505P)

Decision Seq: 386688

Action Code: 345, FORMULA CHANGE TECHNICAL, 90

Decision Status

FFS Start Date

Territative Ind: No

FFS Original Decision

Due Date: 11-Feb-2008

FFS EUP Decision

OPP Target Due Dt:

FFS Sect3 Decision

Negotiated Due Dt:

Start/Stop Clock FQPA Clock:

Registrant

Response Due Date:

Days Elapsed:

Current Status: PENDING (03-Dec-2007)

Decision Comments

Payment

Unmatched Payments

Meetings & Milestones

FFS Information

FFS Negotiated Due Dates

OPP Target Due Date

Decision Ownership

Receipts




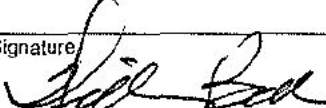
Data Package

Reduced Risk

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S: 820704	LaRocca, George	83122-1	11-Feb-2008	PENDING

submit corrected alternate cst

Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.

 <div style="text-align: center;"> United States Environmental Protection Agency Washington, DC 20460 Formulator's Exemption Statement (40 CFR 152.85) </div>		
Applicant's Name and Address Garnik Industries, LLC 182B Sea Island Parkway, PMB # 558 Beaufort, SC 29907	EPA File Symbol/Registration Number 83122-1	
	Product Name PTO-TEK 50 Fabric Treatment	
	Date of Confidential Statement of Formula (EPA Form 8570-4) 07/06/2007	
As an authorized representative of the applicant for registration of the product identified above, I certify that: (1) This product contains the following active ingredient(s): Permethrin (2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3). (3) Indicate by checking (A) or (B) below which paragraph applies: <input checked="" type="checkbox"/> (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1). OR <input type="checkbox"/> (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF. (4) The following active ingredients in this product qualify for the formulator's exemption.		
Source		
Active Ingredient Permethrin	Product Name 	Registration Number 
Signature 	Name and Title William L. Ball, General Partner	Date 07/06/2007

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy

MATERIAL TO BE ADDED TO JACKET

REG #

83122-1

Description:

<i>check all that apply</i>	
<input type="checkbox"/>	new stamped accepted label
<input checked="" type="checkbox"/>	new CSF
<input type="checkbox"/>	notification

Send to CSC

Instructions:

Attach this sheet to the top of **ALL** material sent to the file room (both loose paper and new material in jackets). This sheet will be imaged; a clear description will aid in finding material in the e-jacket. Remove staples from all material. If returning loose paper then hold together with a binder or paper clip. CSFs should be placed in the CSF folder (if returning jacket) or covered with a red CBI sheet (if returning loose paper). Material to be returned to file room should be place in the appropriate bin.

Reviewer's
Name:

George LaRocca

Date: Nov 21, 2007

Phone: 305-6100

Division: RD/IB



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460-0001

NOV 19 2007

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

William L. Ball
Garnik Industries, LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907

Subject: Amendment/Alternate Source of Active Ingredient
Pro-Tek 50 Fabric Treatment
EPA Reg. No. 83122-1
Your application dated May 15, 2007

Dear Mr. Ball:

The alternate confidential Statement of formula (CSF) dated July 7, 2007 is acceptable and has been placed in the file for the subject product. Please disregard our letter of October 10, 2007 rejecting this alternate CSF.

Please note that a notice of availability of EPA's reregistration eligibility document (RED) for products containing permethrin was published in the FR on June 28, 2006 (vol 71 no. 124 pg. 36788). Additional data and/or labeling changes may be required for products containing permethrin.

If you have any questions in regard to this letter please contact me at (703) 305-6100.

Sincerely,

A handwritten signature in black ink, appearing to read "G. LaRocca".

George T. LaRocca
Product Manager (13)
Registration Division
Insecticide Branch (7505P)

Garnik Industries LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907
(843) 379-5200 • Fax: (843) 589-9262

May 15, 2007

US Environmental Protection Agency
Insecticide Branch
Registration Division (7505P)
Room 4900, One Potomac Yard
2777 South Crystal Dr.
Arlington, VA 22202-4501

Attention: Mr. George LaRocca (Product Manager # 13)

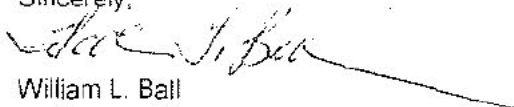
Subject: RE: Application to add alternate source of active ingredient

PRO-TEK 50 Garment Treatment,
EPA Reg. No. 83122-1
Reference your letter dated May 1, 2007

Garnik Industries is submitting an alternate raw material supplier for the Pro-Tek 50 Garment Treatment. Please see attached forms: # 8570-27, Formulator's Exemption Statement and # 8570-4, Confidential Statement of Formula that shows the alternate raw material supplier. The supplier is [REDACTED]. They have provided the [REDACTED] for application to fabric. The [REDACTED]
[REDACTED]

If you have any questions regarding this submission, I can be reached at 843-379-5200.

Sincerely,


William L. Ball
General Partner

mc

DATA PACKAGE BEAN SHEET

Date: 22-Jun-2007

Page 1 of 1

Decision #: 379920

DP #: (340920)

NON PRIA

Parent DP#:

*** Registration Information ***

Registration: 83122-1 - PRO-TEK 50 FABRIC TREATMENT

Company: 83122 - GARNIK INDUSTRIES, LLC

Risk Manager: RM 13 - George Larocca - (703) 305-6100 Room# PY1 S-7219

Risk Manager Reviewer: Olga Odolott OODIOTT

Sent Date: 08-Jun-2007

Calculated Due Date: 02-Sep-2007

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (345) FORMULA CHANGE; TECHNICAL;

Ingredients: 109701, Permethrin(.52%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 22-Jun-2007

Due Back: _____

DP Ingredient: 109701, Permethrin

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 19-Jul-2007

Team Name: CHEM

Science Due Date: _____

Reviewer Name: _____

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Please review attached CSF. The registrant wants to add an alternate source for the active ingredient. Current CSFs and label are available from the e-jacket.

Thanks,
Olga
308-9369

Decision Information for 83122-1

Decision Seq: 379920 Action Code: 345, FORMULA CHANGE, TECHNICAL, 00

FFS Start Date: Due Date: 02-Sep-2007 OPP Target Due Dt: Negotiated Due Dt: Registrant: Response Due Date: **ic**

Tentative Ind: No FFS Original Decision: FFS EUP Decision: FFS Sect3 Decision: Start/Stop Clock: FQPA Clock: Days Elapsed:

Current Status: PENDING (11-Jun-2007)

Decision Comments: Meetings & Milestones: FFS Information: FFS Negotiated Due Dates: OPP Target Due Date: Decision Ownership: Receipts: Data Package: Reduced Risk:

Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
S 811609	Odiott, Olga	83122-1	02-Sep-2007	PENDING

add alternate source of active ingredient

EPA-PRISM Main - Co... George LaRocca - Inb... 9:40 AM

00-345-chem

Olga - The last entry in OPDM shows we did a "no grant" for an alternate supplier however there is no record in the e-jacked. Do you have this letter?

6/15 - requested Vol. 2 from FR

Garnik Industries LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907
(843) 379-5200 • Fax: (843) 589-9262

May 15, 2007

US Environmental Protection Agency
Insecticide Branch
Registration Division (7505P)
Room 4900, One Potomac Yard
2777 South Crystal Dr.
Arlington, VA 22202-4501

Attention: Mr. George LaRocca (Product Manager # 13)

Subject: RE: Application to add alternate source of active ingredient

PRO-TEK 50 Garment Treatment,
EPA Reg. No. 83122-1
Reference your letter dated May 1, 2007

Garnik Industries is submitting an alternate raw material supplier for the Pro-Tek 50 Garment Treatment. Please see attached forms: # 8570-27, Formulator's Exemption Statement and # 8570-4, Confidential Statement of Formula that shows the alternate raw material supplier. The supplier is [REDACTED]. They have provided the [REDACTED] for application to fabric. The [REDACTED]

If you have any questions regarding this submission, I can be reached at 843-379-5200.

Sincerely,


William L. Ball
General Partner



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Garnik Industries, LLC 182B Sea Island Parkway, PMB # 558 Beaufort, SC 2907	EPA File Symbol/Registration Number 83122-1
	Product Name PRO-TEK 50 Fabric Treatment
	Date of Confidential Statement of Formula (EPA Form 8570-4) 05/15/2007

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Permethrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Permethrin	[REDACTED]	[REDACTED]
Signature 	Name and Title William L. Ball, General Partner	Date 05/15/2007

DATE OUT: 07/10/07

SUBJECT: **PRODUCT CHEMISTRY REVIEW OF TGAI/MP [] EP [X]**

DP BARCODE No.: 340920 **REG. No.:** 83122-1

PRODUCT NAME: Pro-Tek 50 Fabric Treatment

COMPANY: Garnik Industries, LLC

PCC: 109701 **DECISION No.:** 379920 **ACTION CODE:** 345

FOOD USE []

INTEGRATED FORMULATION: Yes [] No [X]

FROM Product Chemistry Reviewer: Jing Xu
Product Chemistry Team
Technical Review Branch/RD (7505P)

Jing Xu 7-13-07

8/8/07 7-18-07

TO: Olga Odiott/George LaRocca RM 13
Insecticide Branch/RD (7505P)

INTRODUCTION

The registrant Garnik Industries, LLC has submitted CSF for alternate formulation-1 for its product Pro-Tek 50 Fabric Treatment. TRB has been asked to review the CSF, and determine the acceptability.

SUMMARY OF FINDINGS

The registrant Garnik Industries, LLC would like to add a new supplier source () for its active ingredient Permethrin. The registrant originally submitted a basic CSF (dated 05/15/07), this CSF was later replaced by a new CSF (dated 07/06/07) as alternate formulation-1. The TRB has been asked to review the new CSF (alternate formulation-1, dated 07/06/07), and to determine the acceptability.

1. This product contains Permethrin () as an active ingredient with nominal concentration of 0.52% which is consistent with the product label stated. This CSF (alternate formulation-1, dated 07/06/07) is in compliance with PR Notice 91-2.
2. In the basic CSF (dated 02/21/06), the active ingredient Permethrin has a NC of 0.50% with upper and lower certified limits of 0.55% and 0.45% respectively. This alternate formulation-1 has a NC of 0.52% with upper and lower certified limits of 0.58% and 0.48% respectively which are all about within the certified limits for basic formulation. Other than that this alternate formulation-1 is substantially similar with the basic CSF (dated 02/21/06). The proposed CSF is in compliance with 40CFR§152.43 (Alternate Formulations).

CONCLUSION

The TRB has evaluated the proposed alternate formulation-1 (dated 07/06/07), and has concluded that it is acceptable. The originally submitted CSF (dated 05/15/07) for basic formulation will be void.

DATA PACKAGE BEAN SHEET

Date: 22-Jun-2007

Page 1 of 1

Decision #: 379920

DP #: (340920)

NON PRIA

Parent DP#:

*** Registration Information ***

Registration: 83122-1 - PRO-TEK 50 FABRIC TREATMENT

Company: 83122 - GARNIK INDUSTRIES, LLC

Risk Manager: RM 13 - George Larocca - (703) 305-6100 Room# PY1 S-7219

Risk Manager Reviewer: Olga Odiott OODIOTT

Sent Date: 08-Jun-2007

Calculated Due Date: 02-Sep-2007

Edited Due Date: _____

Type of Registration: Product Registration - Section 3

Action Desc: (345) FORMULA CHANGE, TECHNICAL:

Ingredients: 109701, Permethrin(.52%)

*** Data Package Information ***

Expedite: ☐ Yes ☒ No

Date Sent: 22-Jun-2007

Due Back: _____

DP Ingredient: 109701, Permethrin

DP Title: _____

CSF Included: ☐ Yes ☒ No

Label Included: ☐ Yes ☒ No

Parent DP #: _____

Assigned To

Date In

Date Out

Organization: RD / TRB

Last Possible Science Due Date: 19 Jul 2007

Team Name: CHEM

7/5/07

7/18/07

Science Due Date: _____

Reviewer Name: Jing Xu

7/5/07

7/13/07

Sub Data Package Due Date: _____

Contractor Name: _____

*** Studies Sent for Review ***

No Studies

*** Additional Data Package for this Decision ***

No Additional Data Packages

*** Data Package Instructions ***

Please review attached CSF. The registrant wants to add an alternate source for the active ingredient. Current CSFs and label are available from the e-jacket.

Thanks,

Olga

308-9369

Mr. William L. Ball
Garnik Industries LLC
182B Sea Island Parkway, PMB#558
Beaufort, SC 29907

OCT 10 2007

Dear Mr. Ball:

Subject: Amendment- alternate Confidential Statement of Formula
(CSF) #1
PRO-TEK 50Garment Treatment
EPA Registration Number 83122-1
Your submission dated July 6, 2007

Your alternate Confidential Statement of Formulas (CSF)
dated July 6, 2007 has been reviewed and is not acceptable for the
following reasons:

1. Additional information is required for [REDACTED] of the inert
ingredients (see enclosed Confidential Appendix).

2. Please complete blocks #s 13a and 13b on the CSF.

Sincerely yours,

George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Enclosure

DATE OUT: 10/04/07

SUBJECT: PRODUCT CHEMISTRY REVIEW OF MP ☐ EP ☒

DP BARCODE No.: D342737 **REG. No. /File Symbol No.** 83122-1

PRODUCT NAME: PRO-TEK 50 FABRIC TREATMENT

PCC: 109701 **Decision No.** 379920

FOOD USE ☐

COMPANY: GARNIK INDUSTRIES, LLC

FROM: Indira Gairola, Chemist
Product Chemistry Team
Technical Review Branch/RD (7505P)

(A) 10/05/07

SBM 10/05/07

TO: George Larocca/Linda DeLuise PM 13
Insecticide Branch/ RD (7505P)

INTRODUCTION:

GARNIK INDUSTRIES, LLC has submitted Alternate CSF#1 dated 07/06/07 for the subject product PRO-TEK 50 FABRIC TREATMENT.

Details are listed below:

SUMMARY OF FINDINGS

1. The subject product PRO-TEK 50 FABRIC TREATMENT contains 0.52% of Permethrin.
2. The source of active ingredients for the subject product PRO-TEK 50 FABRIC TREATMENT is registered.
3. Alternate CSF#1 dated 07/06/07 for the subject product PRO-TEK 50 FABRIC TREATMENT was reviewed and found unacceptable on account of the following reasons:

a) Additional information is required for [REDACTED] of the inert ingredients. Please refer to the CONFIDENTIAL APPENDIX for details.

b) Please complete blocks #s 13a. and 13.b. on the CSF need to be completed.

not required.
See 7/12/07 chem
review.
(6) 11/19/07

CONCLUSIONS:

TRB has reviewed the Alternate CSF#1 dated 07/06/07 for the subject product submitted and has concluded that:


1. The subject product PRO-TEK 50 FABRIC contains 0.52% of Permethrin.
2. The label claim is in compliance with PR Notice 91-2.
3. ~~Alternate CSF#1 dated 07/06/07 for the subject product PRO-TEK 50 FABRIC is unacceptable. See finding#3.~~ *not required*
(64) 11/19/07

CONFIDENTIAL APPENDIX

Name of the inert ingredient for which additional information is required :

I. 

Information required :

Specify the type of  along with % of each component and CAS Reg. #.

not
required
02/11/07

Garnik Industries LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907
(843) 379-5200 • Fax: (843) 589-9262

July 6, 2007

US Environmental Protection Agency
Insecticide Branch
Registration Division (7505P)
Room 4900, One Potomac Yard
2777 South Crystal Dr.
Arlington, VA 22202-4501

Attention: Mr. George LaRocca (Product Manager # 13)
Subject: RE: Application to add alternate source of active ingredient

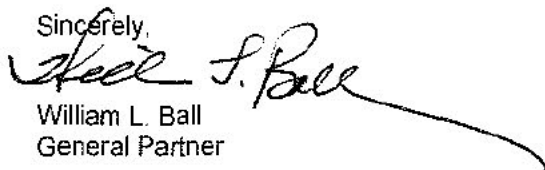
PRO-TEK 50 Garment Treatment,
EPA Reg. No. 83122-1
Reference your letter dated May 1, 2007

Garnik Industries is submitting an alternate raw material supplier for the Pro-Tek 50 Garment Treatment. Please see attached forms: # 8570-27, Formulator's Exemption Statement and # 8570-4, Confidential Statement of Formula that shows the alternate raw material supplier. The supplier is [REDACTED]. They have provided the [REDACTED]

Alternate Formula # 1

If you have any questions regarding this submission, I can be reached at 843-379-5200.

Sincerely,


William L. Ball
General Partner



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Garnik Industries, LLC 182B Sea Island Parkway, PMB # 558 Beaufort, SC 29907	EPA File Symbol/Registration Number 83122-1
	Product Name PTO-TEK 50 Fabric Treatment
	Date of Confidential Statement of Formula (EPA Form 8570-4) 07/06/2007

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Permethrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Permethrin	[REDACTED]	[REDACTED]
Signature 	Name and Title William L. Ball, General Partner	Date 07/06/2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

Gary Innocenti
General Partner
Garnik Industries LLC
182B Sea Island Pkwy., PMB #558
Beaufort, SC 29907

APR 11 2007

SUBJECT: Application for Pesticide Notification – Optional Statements/Deletion of Ants
PRO-TEK 50 Garment Treatment
EPA Reg. No. 83122-1
Application Dated January 24, 2007

Dear Mr. Innocenti:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10 for the product above. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The label submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please me directly at 703-305-6249 or Terri Stowe of my staff at 703-305-6117.

Sincerely,

A handwritten signature in black ink, appearing to read "Linda Arrington".

Linda Arrington
Notifications & Minor Formulations Team Leader
Registration Division (7505P)
Office of Pesticide Programs

Garnik Industries LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907
(843) 379-5200 • Fax: (843) 589-9262

February 1, 2007

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

NOTIFICATION

APR 11 2007

Attention: Mr. George LaRocca (PM # 13)
RE: PRO-TEK 50 Garment Treatment, EPA Reg. No. 83122-1
Addition of Optional Marketing and/or Advisory Statements Per PR Notices 98-10
and 95-2

Dear Mr. LaRocca:

Garnik Industries LLC is filing this notification to add optional marketing and/or advisory statements for PRO-TEK 50 Garment Treatment, EPA Reg. No. 83122-1.

The requested statements as indicated on the attached labeling for this permethrin treated garment involve no change in the ingredients statement, use classification, physical/chemical/biological properties, storage and disposal, or directions for use. There are no changes to the signal word, precautionary statements or statements of practical treatment (First Aid) because these elements are not required per our EPA registration dated October 24, 2006.

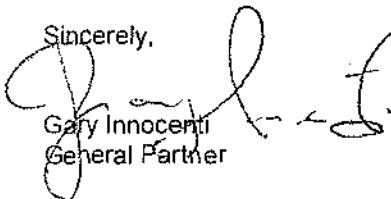
Additionally, the deletion of "ants" as a pest is being requested by notification per Section IID of PR Notice 98-10.

Because this product is not an anti-microbial product, Garnik Industries LLC intends to distribute or sell PRO-TEK 50 Garment Treatment with the modified labeling once EPA receives this notification.

"This notice is consistent with the provisions of PR Notices 98-10 and 95-2 and EPA regulations at 40 CFR §152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

If you have any questions regarding this submission, I can be reached at 843-379-5200.

Sincerely,



Gary Innocenti
General Partner

Master Label

{All text in brackets [xxx] is optional and may or may not appear on a final label}

{All text in braces {xxx} is administrative and will not appear on a final label}

{Hung Tag on Outside of Apparel/ Garment (removed by consumer after purchase.)

NOTIFICATION

PRO-TEK 50

APR 11 2007

Apparel [Garment] Treatment

This apparel [garment] has been treated with PRO-TEK 50 Apparel [Garment] treatment containing the insect repellent permethrin.

Repels Mosquitoes, Ticks, Flies, Chiggers and [&] Midges
Repellency remains effective through 25 washings

[For use as part of a complete pest prevention program.]

[See back panel for more information.]

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total: 100.00 %

Manufactured by:

Garnik Industries

182B Sea Island Pkwy, PMB #558.

Beaufort, SC 29907

EPA Reg. No. 83122-I

EPA Establishment No. 084098-CHN-001

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[Fold bandana, tie around neck of pet.]

Do not re-treat [garment] [bandana] with other permethrin insect repellent products.

{For use when there is exposed skin}

[For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.]

Wash separately from other clothing. Do not dry clean. Dry cleaning removes active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL
[GARMENT]. THIS TAG NOT TO BE REMOVED EXCEPT BY CONSUMER.

Neither Garnik Industries nor any other protection product can guarantee complete
protection from insects, insect bites, or related reactions or diseases.

Master Label

{Label sewn inside apparel}

PRO-TEK 50

Apparel [Garment]

Treatment

Do not Dry Clean

Repels mosquitoes, Ticks,

Flies, Chiggers,
and Midges.

Repellency remains
effective

through 25 washings

----- (fold line) -----

Active Ingredient:

Permethrin 0.52 %

EPA Reg. No. 83122-1

EPA Est. No. 084098-CHN-001

Discard in Trash

Wash separately.

Refer to hang tag for more
information.

of Juvenile

Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. 83122-1

Send to SIG: check box ☐

This material is:

New stamped-accepted label

New CSF

Notification

Final Printed Label

Other: _____

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: Olga Odiott

Phone: 703-308-9369 Division: RD

Date: May 1st, 2007



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES
AND TOXIC SUBSTANCES

MAY 1 2007

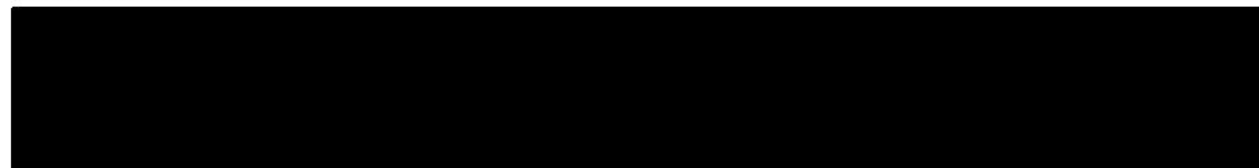
Mr. William L. Ball
Garnik Industries LLC
182 B Sea Island Parkway, PMB #558
Beaufort, SC 29907

Subject: Application to Add Alternate Source of Active Ingredient --- Notification of Deficiencies

PRO-TEK 50 Fabric Treatment
EPA Reg. No. 83122-1
Your submission dated February 22, 2007

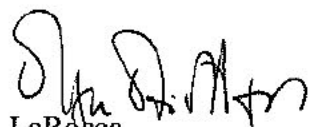
Dear Mr. Ball:

The alternate CSFs for the subject product, dated 22 Feb 2007 is not acceptable for the reasons listed below.



If you have any questions regarding this action, please contact Olga Odiott of my team at (703) 308-9369.

Sincerely,


George T. LaRocca
Product Manager (13)
Insecticide Branch
Registration Division (7505P)

Decision Information for 831

Decision Seq: 376637 Action Code: F15, FORMULA CHANGE, TECHNICAL, 60

FFS Start Date: Due Date: 07-Jun-2007

OPP Target Due Dt: Negotiated Due Dt: Registrant: Response Due Date: [Redacted] [Icon]

Tentative Ind: No FFS Original Decision: FFS ELP Decision: FFS Sect3 Decision: Start/Stop Clock: FGPA Clock: Days Elapsed:

Current Status: PENDING (09-Mar-2007)

Decision Comments: Meetings & Milestones: FFS Information: FFS Negotiated Due Dates: OPP Target Due Date: Decision Ownership: Receipts: Data Package: Reduced Risk:

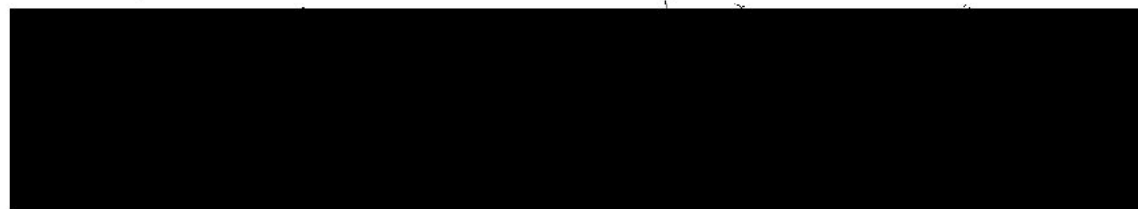
Receipts	Staff Member	Reg/DCI Number	Submission Due Dt	Response
F S 806637	Orlotti, Olga	83122-1	07-Jun-2007	PENDING

add alternate source of ai.

George LaRocca - Inb EPA-PRISM Man - Co... 2:37 PM

oo

- Olga - Set up an A-S lde. Indicate we cannot accept the alternate source since it is



Garnik Industries LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907
(843) 379-5200 • Fax: (843) 589-9262

February 22, 2007

Document Processing Desk
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room 4900, One Potomac Yard
2777 South Crystal Dr.
Arlington, VA 22202-4501

Attention: Mr. George LaRocca (PM # 13)
RE: PRO-TEK 50 Garment Treatment, EPA Reg. No. 83122-t
Revised Label

RE: Submission of alternate raw material supplier

Garnik Industries is submitting an alternate raw material supplier for the Pro-Tek 50 Garment Treatment. Please see attached forms: # 8570-27, Formulator's Exemption Statement and # 8570-4, Confidential Statement of Formula that shows the alternate raw material supplier.

The distributor name and address is:

The Hartz Mountain Corporation, EPA Company Number 2596
400 Plaza Drive
Seaucus, NJ 07094-3688

The Distributor Product name is: HARTZ BUGDANA FOR DOGS ONLY
The final copies of this label will be sent to EPA as soon as they are printed.

If you have any questions regarding this submission, I can be reached at 843-379-5200.

Sincerely,


William L. Ball
General Partner

Form approved. OMB No. 2070-0060, 2070-0057, 2070-0107, 2070-0122, 2070-0164.



United States
Environmental Protection Agency
Washington, DC 20460
Formulator's Exemption Statement
(40 CFR 152.85)

Applicant's Name and Address Garnik Industries LLC 182B Sea Island Parkway, PMB#558 Beaufort, SC 29907	EPA File Symbol/Registration Number 83122-001
	Product Name PRO-TEK 50 Fabric Treatment
	Date of Confidential Statement of Formula (EPA Form 8570-4) 02/22/2007

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Permethrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another person and meets the requirements of 40 CFR section 158.50(e)(2) or (3).

(3) Indicate by checking (A) or (B) below which paragraph applies:

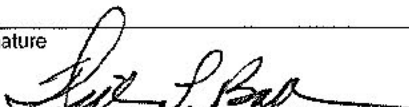
☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement.

That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF)(EPA Form 8570-4) referenced above and on file with the EPA is complete, current, an accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source		
Active Ingredient	Product Name	Registration Number
Permethrin	[REDACTED]	[REDACTED]
Signature 	Name and Title William Ball, General Partner	Date 02/22/2007

EPA Form 8570-27 (Rev. 06-2004)

Copy 1 - EPA
Copy 2 - Applicant copy



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

Office of Pesticide Programs
Registration Division (7505C)

INSECTICIDE BRANCH

F a x

Name: William L. Ball
Organization: Garnik Industries L.L.C.
Fax Number: 843-589-9262
Phone Number:


From: George T. LaRocca, Date: April 16, 2007
Product Manager (13)
Phone Number: 703/305-6100
Fax Number: 703/308-0029

Subject: Submission of Notification/Bugdana/EPA Reg. No. 83122-1-2597

Cover plus 1 Pages:

Comments: Attached is a copy of the e-mail I sent to Mr. Rosenwasser regarding our discussion this morning on the Notification and labeling submitted for Hartz Bugdana for Dogs.

George
LaRocca/DC/USEPA/US
04/16/2007 02:53 PM

To: RRosenwasser@hartz.com
cc: Adrian Enache/R2/USEPA/US@EPA
bcc:
Subject: Re: Submission of Notification/Bugdana/EPA Reg. No.
83122-t-2597 

Dear Messrs. Ball and Rosenwasser,

As a follow-up to our telephone discussion this morning we consider the Notification of January 24, 2007 and associated labeling sent to me by EPA Region 2 under the product name "Bugdana for Dogs" unacceptable under PR Notice 98-10 and 40 CFR 152.46. The explanation stated on EPA Form 8570-1 (Application for pesticide) was "Notification of Addition of Optional Marketing and/or Advisory Statements per PR Notices 98-10 and 95-2." However upon review of this notification and labeling it is determined that these changes involve a change in use site(dogs) and directions for use. PR Notice 98-10 allows addition of an indoor non-food use site only for anti-microbial products(Page 3 II.C) and disallows a change in "Directions for Use" (Page 8 II.N.3.)

Therefore the notification submitted January 24, 2007 and associated labeling "Hartz Bugdana for Dogs" does not fall within the scope of PR Notice 98-10 and must be submitted as a amendment action or application for new registration.

If you have any questions please feel free to contact me at 703-305-6100.

George LaRocca, PM 13
Insecticides Branch
Registration Division
Office of Pesticides Programs, US EPA
703-305-6100
larocca.george@epa.gov
Visit: <http://www.epa.gov/pesticides/>

Bugdana™

FOR DOGS ONLY

THIS GARMENT HAS BEEN TREATED
WITH PER-TEX SO GARMENT
TREATMENT CONTAINING THE INSECT
REPELLENT PERMETHRIN.

PERMETHRIN IS A
NATURAL INSECTICIDE
DERIVED FROM CHAMOMILE
AND CIGAR BUSHES.

PERMETHRIN IS A
NATURAL INSECTICIDE
DERIVED FROM CHAMOMILE
AND CIGAR BUSHES.

PERMETHRIN IS A
NATURAL INSECTICIDE
DERIVED FROM CHAMOMILE
AND CIGAR BUSHES.

PERMETHRIN IS A
NATURAL INSECTICIDE
DERIVED FROM CHAMOMILE
AND CIGAR BUSHES.

Active Ingredient

Permethrin 00.52%
 Other Ingredients 99.48%
 TOTAL 100.00%

Manufactured for:

The Hartz Mountain Corporation
 Secaucus, NJ 07094-3688

EPA Reg. No. 83122-1-2596

EPA Establishment No. 084098-CHN-001

It is a violation of Federal law to use this product in a
 manner inconsistent with its labeling.

Fold bandana, tie around neck of pet.

Do not re-treat bandana with other permethrin insect
 repellent products.

Wash separately from other clothing. Do ~~not~~ dry clean.
 Dry cleaning removes active ingredient.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS
 GARMENT. THIS TAG NOT TO BE REMOVED EXCEPT BY CONSUMER.

Neither Hartz® nor any other insect protection
 product can guarantee complete protection from
 insects, insect bites, or related reactions or diseases.

Hartz® and other trademarks are trademarks of the
 Hartz Mountain Corporation, USA

503661



OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages - (3)

To: George Lavocca	From: Luz GARCIA
Dept/Agency: OPP - Reg DIV	Phone #: 732-321-6780
Fax #: 703-308-0024	Fax #: 732-321-6771

NEN 7540-01-317-7308

5049-101

GENERAL SERVICES ADMINISTRATION

Garnik Industries LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907
(843) 379-5200 • Fax: (843) 589-9262

February 1, 2007

Document Processing Desk (NOTIF)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attention: Mr. George LaRocca (PM # 13)
RE: PRO-TEK 50 Garment Treatment, EPA Reg. No. 83122-1
Addition of Optional Marketing and/or Advisory Statements Per PR Notices 98-10
and 95-2

Dear Mr. LaRocca:

Garnik Industries LLC is filing this notification to add optional marketing and/or advisory statements for PRO-TEK 50 Garment Treatment, EPA Reg. No. 83122-1.

The requested statements as indicated on the attached labeling for this permethrin treated garment involve no change in the ingredients statement, use classification, physical/chemical/biological properties, storage and disposal, or directions for use. There are no changes to the signal word, precautionary statements or statements of practical treatment (First Aid) because these elements are not required per our EPA registration dated October 24, 2006.

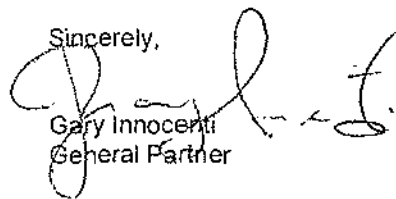
Additionally, the deletion of "ants" as a pest is being requested by notification per Section IID of PR Notice 98-10.

Because this product is not an anti-microbial product, Garnik Industries LLC intends to distribute or sell PRO-TEK 50 Garment Treatment with the modified labeling once EPA receives this notification.

"This notice is consistent with the provisions of PR Notices 98-10 and 95-2 and EPA regulations at 40 CFR §152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

If you have any questions regarding this submission, I can be reached at 843-379-5200.

Sincerely,



Gary Innocenti
General Partner



Read instructions on reverse before completing form.

Form Approved. OMB No. 2070-0060. Approval expires 2-28-95



United States
Environmental Protection Agency
Washington, DC 20460

☐ Registration
☐ Amendment
☒ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83122-1	2. EPA Product Manager G. Larocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PRO-TEK Garment Treatment	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Garnik Industries LLC 182B Sea Island Parkway, PMB #558 Beaufort, SC 29907 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(ii), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input checked="" type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

"Notification of Addition of Optional Marketing and/or Advisory Statements per PR Notices 98-10 and 95-2"

"This notice is consistent with the provisions of PR Notices 98-10 and 95-2 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the Confidential Statement of Formula of this product. I understand that it is a violation of 18 U.S.C. Sec. 1001 to willfully make any false statement to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA."

Section - III

1. Material This Product Will Be Packaged In:			
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	2. Type of Container <input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____
* Certification must be submitted		If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container	5. Location of Label Directions <input type="checkbox"/>
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper, glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)		
Name Gary Innocenti	Title General Partner	Telephone No. (Include Area Code) 843-379-5200
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title General Partner	
4. Typed Name Gary Innocenti	5. Date January 24, 2007	

Master Label

{All text in brackets [xxx] is optional and may or may not appear on a final label}

{All text in braces {xxx} is administrative and will not appear on a final label}

{Hang Tag on Outside of Apparel/ Garment (removed by consumer after purchase.)}

PRO-TEK 50

Apparel [Garment] Treatment

This apparel [garment] has been treated with PRO-TEK 50 Apparel [Garment] treatment containing the insect repellent permethrin.

**Repels Mosquitoes, Ticks, Flies, Chiggers and [&] Midges
Repellency remains effective through 25 washings**

[For use as part of a complete pest prevention program.]

[See back panel for more information.]

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total: 100.00 %

Manufactured by:

Garnik Industries

182B Sea Island Pkwy, PMB #558.

Beaufort, SC 29907

EPA Reg. No. 83122-1

EPA Establishment No. 084098-CHN-001

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

[Fold bandana, tie around neck of pet.]

Do not re-treat [garment] [bandana] with other permethrin insect repellent products.

{For use when there is exposed skin}

[For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.]

Wash separately from other clothing. Do not dry clean. Dry cleaning removes active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL [GARMENT]. THIS TAG NOT TO BE REMOVED EXCEPT BY CONSUMER.

Neither Garnik Industries nor any other protection product can guarantee complete protection from insects, insect bites, or related reactions or diseases.

Master Label

{Label sewn inside apparel}

PRO-TEK 50

Apparel [Garment]

Treatment

Do not Dry Clean

Repels mosquitoes, Ticks,

Flies, Chiggers,

and Midges.

Repellency remains

effective

through 25 washings

----- (fold line) -----

Active Ingredient:

Permethrin 0.52 %

EPA Reg. No. 83122-1

EPA Est. No. 084098-CHN-001

Discard in Trash

Wash separately.

Refer to hang tag for more
information.



Adrian
Enache/R2/USEPA/US
04/13/2007 01:37 PM

To RRosenwasser@hartz.com
cc GPincar@hartz.com, LHemsarh@hartz.com,
maxmarx@hartz.com, MDraper@hartz.com,
RFretty@hartz.com, RLombardi@Hartz.com,
bcc

Subject Re: Hartz Bugdana For Dogs Only

Mr. Rosenwasser,

I received your 4/12/07 email. While we will work with our Registration Division to expedite the review and resolution on this Notification, I would like in the meantime to offer a comment concerning this Notification issue - the PR Notice 98-10, sub part D. Adding, Revising or Deleting Advisory Statements which apparently was used as basis for filing the Notification you attached below, clearly states that " Registrants should also note that advisory statements required by EPA may not be deleted by notification....". According to the October 24, 2006 letter from EPA to Garnik Industries Inc. granting the conditional registration for the product "83122-1", it appears that the advisory statement deleted by this notification was in fact required by EPA, and deletion of the advisory statement can be accomplished using the PR Notice 98-10. Furthermore, until a final determination is rendered by this office or a mutually acceptable solution is agreed upon by both EPA and Hartz, please note that not only EPA Region 2 has not released these shipments, but we also strongly advise you to hold intact these shipments in your Bloomfield warehouse, and refrain from offering additional shipments from entry.

Sincerely,

Dr. Adrian J. Enache, Ph.D., M.P.H.
Pesticides and Toxic Substances Branch
ph. 732-321-6769
fax 732-321-6771
RRosenwasser@hartz.com



RRosenwasser@hartz.com
04/12/2007 04:34 PM

To Adrian Enache/R2/USEPA/US@EPA
cc WGilmore@hartz.com, LHemsarh@hartz.com,
maxmarx@hartz.com, MDraper@hartz.com,
RFretty@hartz.com, GPincar@hartz.com,
RLombardi@Hartz.com
Subject Hartz Bugdana For Dogs Only

Dear Mr. Adrian:

I have received your email dated April 12, 2007 and would like to offer a comment relative to the misbranding issue. Pro-Tek 50, as originally registered by Garnik Industries, was intended to be a product for human fabric (clothing) applications. The advisory statement in question, "For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin", was applied to the label to provide risk mitigation for use by humans.

When Hartz approached Garnik for potentially using their primary registration for a dog fabric (bandana) application, the above advisory statement was inappropriate for the application as exposed skin is not an issue with dogs in our intended use as a piece of treated fabric around the dogs neck. In order to add optional statements suitable for our product, Garnik and Hartz worked on the primary label with the intent of creating a Master Label while at the same time adding optional marketing statements. On February 1,

2007, Garnik filed a notification to EPA creating the Master Label. No advisory statements were removed from the primary label. To accommodate the first use as an animal fabric product, the statement, "For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin" was bracketed with an administrative statement above it that stated "For use when there is exposed skin".

This was logical as exposed skin was not an issue for dogs and PR Notices 98-10 and 95-2 give the registrant latitude to make such changes without filing an amendment. The exposed skin statement could be construed as misbranding in an animal application.

After 30 days had elapsed, there was no correspondence from EPA either rejecting the notification outright or requiring the registrant to file an amendment to make the change. Without any direct evidence of disapproval by the Agency, Hartz produced the final label copy which was observed by the Region 2 inspection at Bloomfield on April 11, 2007. In the absence of an approval letter, PR Notice 98-10 states that, "a registrant may distribute or sell a non anti-microbial product modified by notification once EPA receives that notification."

I am attaching a copy of the notification filed by Garnik Industries on February 1, 2007. In order to resolve the current situation, we request that EPA resolve whether the notification which was filed was approved or rejected. As we have no evidence one way or the other, your findings will pave the way for resolving the issue.

Please let me know if you have additional questions.

Sincerely,

Robert Rosenwasser
Director, Regulatory Affairs

The Hartz Mountain Corporation
400 Plaza Drive
Secaucus, NJ 07094-3688
email: rrosenwasser@hartz.com
phone: 201-271-4800, ext. 7202

Robert Rosenwasser
Director, Regulatory Affairs
The Hartz Mountain Corporation
400 Plaza Drive
Secaucus, NJ 07094-3688
email: rrosenwasser@hartz.com



phone: 201-271-4800, ext. 7202 Notification.tif

Material to be added to a Mini-Jacket (in the case where an e-Jacket exists)

Reg. No. 83122-1

Send to SIG: check box ☐

This material is:

☐ New stamped-accepted label

☐ New CSF

☐ Notification

☒ Final Printed Label

☐ Other: _____

Instructions: Attach this notice on top of the material. It must be clipped all together and there should be NO STAPLES in the material. Then give the material with this coversheet to staff in the Information Services Center (Room 230).

Reviewer's Name: GEORGE LARocca

Phone: 703-305-6100 Division: RD/IB

Date: February 16, 2007

FPH

Garnik Industries LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907
(843) 379-5200 • Fax: (843) 589-9262

January 20, 2007

Document Processing Desk
Office of Pesticide Programs (RD), 7504 P
US Environmental Protection Agency
Room 4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

Attention: Mr. George LaRocca (PM # 13)
RE: PRO-TEK 50 Garment Treatment, EPA Reg. No. 83122-1
Revised Label

Dear Mr. LaRocca:

We received your comments for the PRO-TEK 50 Garment Treatment.
Please see the attached labels changes as directed by your office.
A copy of the accepted letter is attached for your information.

The product will be marketed under the name HARTZ BUGDANA FOR DOGS.
The final copies of this label will be sent to EPA as soon as they are printed.

If you have any questions regarding this submission, I can be reached at 843-379-5200.

Sincerely,


William L. Ball
General Partner

October 24, 2006

Master Label

Hang Tag on Outside of Apparel/ Garment (removed by consumer after purchase)

PRO-TEK 50

Apparel (Garment) Treatment

This apparel (garment) has been treated with **PRO-TEK 50 Apparel (Garment)** treatment containing the insect repellent permethrin.

Repels Mosquitoes, Ticks, Ants, Flies, Chiggers and Midges
Repellency remains effective through 25 washings

DO NOT DRYCLEAN

EPA Reg. No. 83122-1

EPA Establishment No. XXXX-XX-XXX

Active Ingredient:

Permethrin 0.52 %

Other Ingredients: 99.48 %

Total 100.00 %

Manufactured by:

Garnik Industries

182B Sea Island Pkwy, PMB #558.

Beaufort, SC 29907

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat garment with other permethrin insect repellent products. For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin

Wash separately from other clothing. Do not dry clean. Dry cleaning removes active ingredient.

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Disposal: Discard in trash. Do not reuse.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING OF THIS APPAREL (GARMENT). THIS TAG NOT TO BE REMOVED EXCEPT BY CONSUMER.

Neither Garnik Industries nor any other protection product can guarantee complete protection from insects, insect bites, or related reactions or diseases.

Master Label

Label sewn inside apparel

PRO-TEK 50

Apparel (Garment)

Treatment

Do not Dry Clean

Repels mosquitoes, Ticks,
Ants, Flies, Chiggers,
and Midges.

Repellency remains
effective

through 25 washings

----- (fold line) -----

Active Ingredient:

Permethrin 0.52 %

EPA Reg. No. 83122-1

EPA Est. No. XXX-XX-XXX

Discard in Trash

Wash separately.

Refer to hang tag for more
information.



U.S. ENVIRONMENTAL PROTECTION
AGENCY

Office of Pesticide Programs
Registration Division (7505P)
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

EPA Reg.
Number:
83122-1

Date of
Issuance:
OCT 24 2006

Term of Issuance:
Conditional

Name of Pesticide Product:
Pro-Tek-50 Fabric Treatment

NOTICE OF PESTICIDE:

☒ Registration
☐ Reregistration

(Under FIFRA as amended)

Name and Address of Registrant (include ZIP Code):

Garnik Industries, LLC
484 Browns Cove Road
Ridgeland, SC 29939

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A), provided that:

1. You will submit and/or cite all data required for registration/reregistration of your product under FIFRA sec. 3(c)(5) when the Agency requires all registrants of similar products to submit such data; and submit acceptable responses required for reregistration of your product under FIFRA section 4.
2. You will make the following label changes before you release the product for shipment:
 - a. Revise the EPA Registration Number to read "EPA Reg. No. 83122-1
 - b. Delete the word fabric throughout the label and product name or replace with apparel. The word fabric is too generic and can imply use on items other than apparel.
 - c. The statement beginning, "For protection of exposed skin...etc." is not optional. Delete the parenthesis.

3. Product Chemistry data requirements for the 830 Series Subgroup A and Subgroup B guidelines are satisfied, except for the one year storage stability study. Storage stability (830.6317) data are outstanding and must be submitted to satisfy the requirements of 40CFR 158.190. This study should be conducted on the treated garment under typical storage conditions.
4. Since the clothing apparel will be treated with permethrin before sewn into final clothing pieces the establishment that performs the final construction of the apparel is considered a pesticide manufacturer. Such establishments must either obtain their own registrations or be under contract with the basic registrant to manufacture the final apparel pieces. If there are clothing manufacturers or other establishments that will cut, sew, and label the final product under the Garnik registration number then they must be under contract with you to do this processing. They must also obtain EPA establishment numbers. You have also confirmed that no further apparel processing other than cutting and sewing the final apparel pieces will be performed.
5. Please note that a notice of availability of EPA's reregistration Eligibility document (RED) for products containing permethrin was Published in the FR on June 28, 2006 (Vol 71 no. 124 page 36788). Additional data and/or labeling changes may be required for products containing pyrmethrin.
6. Please submit (3) copies of your final printed labeling before releasing the product for shipment. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(c). Your release for shipment of the product bearing amended labeling constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

Signature of Approving Official:



Date:

October 24, 2006

Enclosures

Master Label

Hang-Tag on Outside of Garment (removed by consumer after purchase)
[Bracketed text - optional language]

PRO-TEK 50

Fabric Treatment

This fabric *[garment]* has been treated with
PRO-TEK 50 Fabric Treatment
containing the insect repellent permethrin.

Repels Mosquitoes, Ticks, Ants, Flies, Chiggers and Midges
Repellency remains effective through 25 washings

DO NOT DRYCLEAN

EPA Reg. No. 83122-XXX
EPA Establishment No. XXXX-XX-XXX

Active Ingredient:	
Permethrin	0.52%
Other Ingredients:	<u>99.48%</u>
Total	100.00%

Manufactured by:
Garnik Industries.
484 Brown's Cove Road
Ridgeland, SC 29936

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Do not re-treat fabric *[garment]* with other permethrin insect repellent products. *[For protection of exposed skin, use in conjunction with an insect repellent registered for direct application to skin.]*

Wash separately *[from other clothing]*. Do not dry clean. Dry cleaning removes active ingredient.

Storage and Disposal
Do not contaminate water, food or feed by storage or disposal.
Disposal: Discard in trash. Do not reuse.

RETAIN THIS TAG FOR FUTURE REFERENCE ON PROPER HANDLING *[OF THIS FABRIC [GARMENT]]*. THIS TAG NOT TO BE REMOVED EXCEPT BY CONSUMER..

Neither Garnik Industries nor any other insect protection product can guarantee complete protection from insects, insect bites, or related reactions or diseases.

**ACCEPTED
with COMMENTS
In EPA Letter Dated:**

OCT 24 2001

Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
83122-XXX



Master Label

Label sewn inside apparel

PRO-TEK 50

Fabric Treatment

Do Not Dry Clean

Repels mosquitoes, ticks,
ants, spiders, flies, chiggers,
and midges.

Repellency remains
effective
for 25 washings.

----- (fold line) -----

Active Ingredient:

Permethrin 0.52%

EPA Reg. No. 83122-XX

EPA Est. No. XXX-XX-XXX

Discard in trash.

Wash separately.

Refer to hang tag for more
information.

**Garnik Industries, LLC
182B Sea Island Parkway, PMB #558
Beaufort, SC 29907
(843) 379-5200 • FAX (843) 589-9262**

October 25, 2006

Mr. George LaRocca (PM #13)
Office of Pesticide Programs (7504P)
US Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Room S-4900, 4th Floor
Arlington, VA 22202

RE: "PRO-TEK 50 Fabric Treatment", EPA File Symbol #83122-XXX
Statement Pertaining to the Application of Product to Bulk Fabric

Dear Mr. LaRocca:

This letter is in response to the Agency's question concerning the application of "PRO-TEK 50 Fabric Treatment" to bulk fabric. We wish to clarify that the "PRO-TEK 50" is applied at the end of the production process, and that no other application, such as a permanent press treatment, water repellent treatment, etc. is made to the bulk fabric after the "PRO-TEK 50".

Should you have any questions or wish to reach me, please feel free to contact my office at (843) 379-5200.

Sincerely,

William Ball
Partner

Ken Weinstein
Direct Dial: 202-637-2166
ken.weinstein@lw.com

555 Eleventh Street, N.W., Suite 1000
Washington, D.C. 20004-1304
Tel: (202) 637-2200 Fax: (202) 637-2201
www.lw.com

LATHAM & WATKINS LLP

March 9, 2006

Mr. George LaRocca
Office of Pesticide Programs
Environmental Protection Agency
401 M Street, SW
Washington, DC 20460

Re: Permethrin Registration for Garnik Industries
PRO-TEX 50 Fabric Treatment

Dear Mr. LaRocca:

This follows my letter to Jim Jones dated February 10, 2006 on behalf of Buzz Off Insect Shield, LLC regarding permethrin-treated garments. We understand that Garnik Industries has applied for a "me-too" registration of apparel treated with permethrin, as noted above. There are two points that we request EPA to consider regarding this application:

First, as indicated in my letter to Mr. Jones, we believe that only garments treated with permethrin at the *final stage* of production should be registered as "me-too" products. EPA has relied on the data from the public literature and from government reports to support the efficacy of clothing containing permethrin to repel insects. However, the data only supports the efficacy of fabric treated with permethrin which is not subsequently subjected to processing, or garments treated with permethrin at the final production stage. The available data does not support the efficacy of clothing made from permethrin-treated fabric that is subsequently subjected to chemical and physical treatments, as described in my letter to Mr. Jones. The timing of application of permethrin to the garment greatly affects the garment's efficacy as a repellent. Processing of the garment after application of permethrin significantly reduces the garment's efficacy. Therefore, any registration issued to Garnik should make it clear that Garnik may only treat apparel with permethrin at the final stage of production.

Moreover, if Garnik is merely using fabric treated with permethrin to make apparel, such products would not be entitled to conditional registration as a "substantially similar" product under FIFRA § 3(c)(7)(A). While the existing efficacy data supports the efficacy of Buzz Off's garments, there is no efficacy data on file with EPA supporting the efficacy of apparel made from treated fabric that is subjected to processing. Under Section 3(c)(7)(A), all applicants must be treated the same. Since Buzz Off had to demonstrate the efficacy of its type of garments before it was permitted to obtain a registration, Garnik would have to do the same: It would have to submit efficacy data on its final apparel made from treated fabric before registration could be approved.

FIRM / AFFILIATE OFFICES

Brussels	New York
Chicago	Northern Virginia
Frankfurt	Orange County
Hamburg	Paris
Hong Kong	San Diego
London	San Francisco
Los Angeles	Shanghai
Milan	Silicon Valley
Moscow	Singapore
Munich	Tokyo
New Jersey	Washington, D.C.

LATHAM & WATKINS^{LP}

Second, in addition to efficacy considerations, Buzz Off developed and submitted its own data for exposure and risk characterization to establish the safety of its own permethrin-treated garments.¹ However, these data are specific to the unique Buzz Off permethrin impregnation process, which results in lower human exposure because of the manner in which the permethrin binds to the garment, as we believe will be noted in the permethrin RED. These exposure and risk characterization data do not support the safety of any apparel other than that treated by the Buzz Off process, and certainly do not support the safety of apparel made from treated fabric that is subjected to later processing. Garnik cannot rely upon the Buzz Off data to support the safety of its apparel, but must either generate its own data or rely solely upon EPA's default assumptions and any associated safety decisions.

Thank you very much for your consideration of our views. To the extent that you are not in agreement with these positions, we request that you advise us of that fact.

Sincerely,



Kenneth Weinstein

DC846447.1

¹ Jeffrey H. Driver, Dr.P.H., D.A.B.T., C.L.S.; John H. Ross, PhD, D.A.B.T. InfoScientific, LLC Report ID BuzzOff-001-05 (2005) Evaluation of Potential Exposures and Health Risks Associated with Buzz OFF Insect Shield Insect Repellent Apparel MRID 46708702; Joel A. Panara, MaryEllen Riley. Grayson Research, LLC Study Number GR05-523. (2005). A Non-GLP Pilot Study to Test Methodology for Biological Monitoring and Determination of Dermal Exposure to Individuals Wearing BUZZ OFF Insect Shield Insect Repellent Apparel. MRID 46721201



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

February 28, 2006

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

PLEASE RETURN A COPY OF THIS LETTER WITH PAYMENT

OPP Decision Number: D-365250
EPA File Symbol or Registration Number: 83122-R
Product Name: PRO-TEK 50 FABRIC TREATMENT
EPA Receipt Date: 24-Feb-2006
EPA Company Number: 83122
Company Name: GARNIK INDUSTRIES, LLC

WILLIAM L. BELL
GARNIK INDUSTRIES, LLC
484 BROWNS COVE ROAD
RIDGELAND, SC 29936-

SUBJECT: Receipt of Application Subject to Registration Service Fee - Fast Track

Dear Registrant:

The Office of Pesticide Programs has received your application for registration. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R30
NEW PRODUCT; ME-TOO PRODUCT FAST TRACK;
Within 30 days, please remit payment in the amount of: \$ 1,050 to the address below.

If you do not submit payment within 30 days of the date of this letter, the Agency will reject your application pursuant to Section 3(c)(3)(B) of FIFRA. Any subsequent submission relating to this action must be submitted as a new application.

By USPS:

USEPA Washington Finance Center
Pesticide Registration Service Fee
PO Box 360277
Pittsburgh, PA 15251

By Courier:

U.S. EPA Washington Finance Center

Pesticide Registration Service Fee
C/O Mellon Client Service Center
500 Ross Street, Room 670
Box 360277
Pittsburgh, PA 15251-6277
Attn: EPA Module Supervisor
Telephone: (412) 236-2294

All payments must be in United States currency by check, bank draft, or money order drawn to the order of the Environmental Protection Agency. To ensure proper credit, please write the OPP DECISION NUMBER on your check, and enclose a copy of this letter with your payment.

You may be eligible for a full or partial waiver of the registration service fee if, for example, you qualify as a small business or are applying for a minor use, or if your application is solely associated with an IR-4 tolerance petition. Please be advised that if you intend to request a waiver, you must do so in writing within 15 days of receipt of this invoice instead of remitting the amount indicated above. OPP will not consider waiver requests after the registration service fee has been paid. Information regarding eligibility and how to request and document a fee waiver is available on the OPP Fee for Service web site at www.epa.gov/pesticides/fees.

Please send Registration Service Fee Waiver requests to:

By USPS:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

By Courier:

Document Processing Desk (WAIVER)
Office of Pesticide Programs (7504C)
U.S. Environmental Protection Agency
Room 266A, Crystal Mall #2
1801 S. Bell St.
Arlington, VA 22202

A PRIA decision time review period will not start until a fee waiver is granted and/or the Agency receives certification that the outstanding fee has been paid. If the Agency does not receive certification of payment for this action or a fee waiver request within the next 45 days, the Agency will presume that you no longer want to pursue this action. The Agency will then initiate a process that may result in administrative withdrawal of this action.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 305-6249.

Sincerely,



Front End Processing Staff
Information Technology & Resources Management Division

February 22, 2006

Document Processing Desk (REGFEE)
Office of Pesticide Programs (7504C)
US Environmental Protection Agency
Room 266A, Crystal Mall 2
1801 South Bell Street
Arlington, VA 22202-4501

Attention: Mr. George LaRocca (PM #13)
RE: PRO-TEK 50 Fabric Treatment, EPA Reg. No. 83122-XXX
Application for Pesticide Registration

Dear Mr. LaRocca:

On behalf of Garnik Industries we are submitting this Application for Pesticide Registration (EPA Form 8570-1) for the above-mentioned product. The subject product contains permethrin as the active ingredient for use as a fabric treatment for the control of mosquitoes, ticks, ants, flies, chiggers and midges. The nominal concentration of permethrin in the product is 0.52% w/w. The following documents are enclosed to process this application:

Administrative Materials

- Application for Pesticide Registration; EPA Form 8570-1.
- Certification With Respect to Citation of Data; EPA Form 8570-34
- Data Matrix
- EPA Formulator's Exemption Statement (EPA Form 8570-27).
- EPA Confidential Statement of Formula (EPA Form 8570-4)
- Five (5) copies of draft labeling.

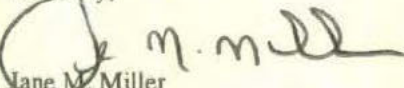
This application is submitted under the Formulator's Exemption Provision of FIFRA section 3(c)(2)(D). In addition, according to FIFRA section 3(c)(3)(b)(i), this application qualifies for an expedited review on the basis that this product is similar or identical in composition and labeling to "Bond-It Insect Repellent Fabric Treatment", EPA Reg. No. 48139-15.

With regard to the citations in the data matrix, Garnik Industries has cited the product chemistry data for EPA Reg. No. 48139-15. To satisfy the data requirements for acute toxicity and efficacy, Garnik Industries has chosen the cite-all option under the selective method of support. Offer to pay letters have been sent to all companies listed on the September 30, 2005 Data Submitters List for permethrin.

This registration action will fall within the PRIA category as stated in Table 4 - Registration Division: New Products as published in the June 2, 2005 Federal Register. This action is further defined under EPA No. R30; CR No. 85 as a "New Product" "Me-Too Product" "Fast Track". The PRIA fee for this registration action is therefore \$1,050.

Should you have any questions or wish to reach me, please feel free to contact our office at (203) 740-1200.

Sincerely,


Jane M. Miller
Agent for Garnik Industries



United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 83122- XXM R	2. EPA Product Manager G. LaRocca	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) PRO-TEK 50 Fabric Treatment	PM# 13	
5. Name and Address of Applicant (Include ZIP Code) Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. 48139-15 Product Name Bond-It Insect Repellent Fabric Treatm	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input checked="" type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This application for a new pesticide product will fall within the category on Table 4 - Registration Division: New Products as published in the June 2, 2005 Federal Register. This product is further defined under EPA No. R30; CR No. 85 as a "New Product", "Me-Too Product", "Fast Track." Garnik Industries is citing product chemistry and using the cite-all method for any acute toxicity and efficacy data that may be applicable to this registration action. The PRIA fee for this application is \$1,050.

Jane Miller Tel: 203-740-1200; Fax: 203-740-1220; Email: jmill@biologicconsulting.com

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Metal	
<input checked="" type="checkbox"/> Certification must be submitted	If "Yes" Unit Packaging wgt. No. per container	If "Yes" Package wgt. No. per container		<input checked="" type="checkbox"/> Plastic	
				<input type="checkbox"/> Glass	
				<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input type="checkbox"/> Label <input checked="" type="checkbox"/> Container		4. Size(s) Retail Container fabric		5. Location of Label Directions <input checked="" type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input checked="" type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled			<input type="checkbox"/> Other _____		

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name Jane M Miller		Title Agent for Garnik Industries		Telephone No. (Include Area Code) 203-740-1200	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Agent for Garnik Industries			
4. Typed Name Jane M. Miller		5. Date February 22, 2006			

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

 401 M Street, S.W.
 WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

 Applicant's/Registrant's Name, Address, and Telephone Number
 Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936

 EPA Registration Number/File Symbol
 83122-*** /

 Active Ingredient(s) and/or representative test compound(s)
 Permethrin

 Date
 February 22, 2006

 General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
 Indoor

 Product Name
 PRO-TEK 50 Fabric Treatment

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☒ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

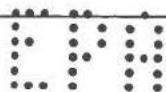
Signature

Date

Feb. 22, 2006

Typed or Printed Name and Title

Jane Miller, Agent for Garnik Industries



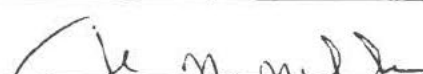
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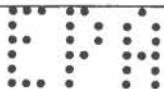
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DATA MATRIX

Date February 21, 2006		EPA Reg. No./File Symbol 83122-XXX		Page 1 of 14	
Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936		Product PRO-TEK 50 Fabric Treatment			
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.1550	Product Identity and Composition	46507501	Garnik Industries	PAY	
830.1600	Description of Materials Used to Produce the Product	46507501	Garnik Industries	PAY	
830.1650	Description of Formulation Process	46507501/46661401	Garnik Industries	PAY	
830.1670	Discussion of Formation of Impurities	46507501	Garnik Industries	PAY	
830.1750	Certified Limits	46507501	Garnik Industries	PAY	
830.1800	Enforcement Analytical Method	46507501	Garnik Industries	PAY	
830.1900	Submittal of Samples				1
830.6302	Color	46507501	Garnik Industries	PAY	
830.6303	Physical State	46507501	Garnik Industries	PAY	
830.6304	Odor	46507501	Garnik Industries	PAY	
830.6314	Oxidation / Reduction: Chemical Incompatibility				2
830.6315	Flammability / Flame Extension				3
830.6316	Explosibility				4
830.6317	Storage Stability				5
830.6319	Miscibility				6
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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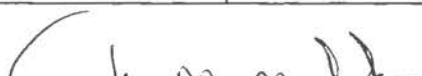
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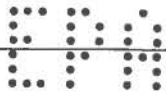
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6320	Corrosion Characteristics				7
830.6321	Dielectric Breakdown Voltage				8
830.7000	PH	46507501	Garnik Industries	PAY	
830.7100	Viscosity				9
830.7300	Density	46507501	Garnik Industries	PAY	
870.1100	Acute Oral Toxicity	Cite-All		PAY	
870.1200	Acute Dermal Toxicity	Cite-All		PAY	
870.1300	Acute Inhalation Toxicity	Cite-All		PAY	
870.2400	Acute Eye Irritation	Cite-All		PAY	
870.2500	Acute Dermal Irritation	Cite-All		PAY	
870.2600	Skin Sensitization	Cite-All		PAY	
810.3400	Efficacy	Cite-All		PAY	
The following companies have been sent Offer-To-Pay letters for the 870 & 810 Guideline Series:			Bonide Products		
			Oriskany, NY		
			Coopers Animal Health		
			Mundelein, IL		
			The Ortho Business Group		
			Marysville, OH		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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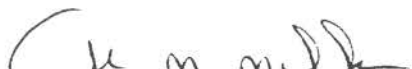


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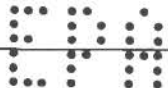
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			FMC Corp.		
			Philadelphia, PA		
			Nott Manufacturing		
			Coram, NY		
			Bayer Advanced		
			Montvale, NJ		
			Realex		
			St. Louis, MO		
			Chase Products		
			Maywood, IL		
			Prentiss, Inc.		
			Floral Park, IL		
			Schering-Plough Animal Health		
			Union, NJ		
			Southern Ag. Insecticides		
			Palmetto, FL		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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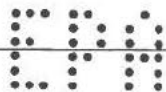
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			McLaughlin Gormley King Co.		
			Minneapolis, MN		
			PBI/Gordon Corp.		
			Kansas City, MO		
			Virbac AH		
			Fort Worth, TX		
			Wellmark International		
			Schaumburg, IL		
			W.C. Miller Chem. Co.		
			Houston, TX		
			Lynwood Labs.		
			Needham, MA		
			ABC Compounding Co.		
			Atlanta, GA		
			Boehringer Ingelheim Vetmedica		
			Elwood, KS		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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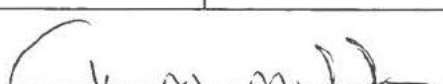
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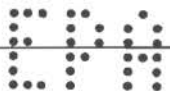
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Pet Chemicals		
			Memphis, TN		
			S.C. Johnson & Son		
			Racine, WI		
			Cessco Inc.		
			Johns Island, SC		
			IQ Products		
			Houston, TX		
			Voluntary Purchasing Group		
			Carrollton, TX		
			Clarke Mosquito Control		
			Roselle, IL		
			Syngenta Crop Protection, Inc.		
			Greensboro, NC		
			Safeguard Chemical Corp.		
			Bronx, NY		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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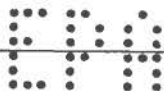
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Sunniland Corp.		
			Miami, FL		
			Chemsico		
			St. Louis, MO		
			Zeneca Ag Products		
			Greensboro, NC		
			Bayer Healthcare, LLC		
			Shwanee Mission, KS		
			Speer Products Inc.		
			Memphis, TN		
			Gil MFG Inc.		
			Montgomery, AL		
			Sandoz Agro Inc.		
			Des Plains, IL		
			Pyranha Inc.		
			Carrollton, TX		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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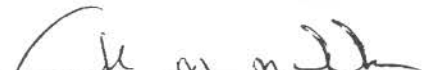
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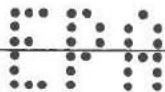
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Unicorn Labs.		
			Clearwater, FL		
			Aerochem Inc.		
			Raymond, MS		
			Senoret Chemical Co., Inc.		
			Bethesda, MD		
			Drummond American Corp.		
			Vernon Hills, IL		
			Enforcer Products		
			Atlanta, GA		
			Safer Inc.		
			Lititz, PA		
			CTX-Cenol Inc.		
			Twinsburg, OH		
			Insecta Marketing Inc.		
			Oakland Park, FL		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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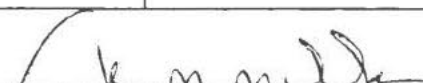
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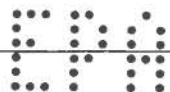
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Burlington Scientific Corp.		
			Farmingdale, NY		
			K-G Packaging		
			Dearborn, MI		
			Bikel Company		
			Annapoli, MD		
			Coulston Products Inc.		
			Rockville, MD		
			Micro-Flo Company		
			Memphis, TN		
			Garnik Industries		
			Pasadena, TX		
			Arizona Chemical Group		
			Los Angeles, CA		
			Lineguard, Inc.		
			Elyria, OH		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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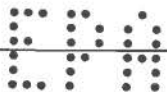
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Spray Drift Task Force		
			Washington, DC		
			Ecto Development Corp.		
			Excelsior Springs, MO		
			Sherwin-Williams Consumer Group		
			Cleveland, OH		
			Bengal Products		
			Baton Rouge, LA		
			United Phosphorous		
			Trenton, NJ		
			Riap Chemical Factory		
			Washington, DC		
			Outdoor Residential Exposure Task		
			Washington, DC		
			Agricultural Re-Entry Task Force		
			Washington, DC		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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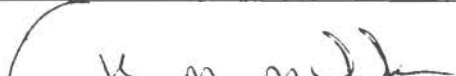
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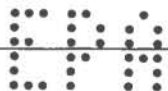
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Plexus Services		
			Miami, FL		
			Star Horse Products		
			Goodyear, AZ		
			Valent Biosciences Corp.		
			Libertyville, IL		
			Marketquest Inc.		
			Salem, VA		
			A.N.T.S. Research & Dev.		
			Breckenridge, TX		
			Ike Dyals Co.		
			Casselberry, FL		
			NIX, Inc.		
			Washington, DC		
			Travel Medicine		
			Northampton, MA		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Bio-Planet Products		
			Honolulu, HI		
			Buzz Off Insect Shield		
			Greensboro, NC		
			Koppers Arch Wood Protection		
			Washington, DC		
			Farnam Companies		
			Phoenix, AZ		
			Bayer Environmental Science		
			Montvale, NJ		
			Univar USA, Inc.		
			Austin, TX		
			W.F. Young, Inc.		
			East Longmeadow, MA		
			Product & Regulatory Assoc.		
			Mount Laurel, NJ		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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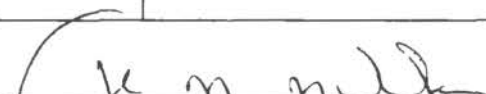
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

401 M Street, S.W.
WASHINGTON, D.C. 20460

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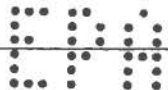
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DATA MATRIX

Date February 21, 2006			EPA Reg. No./File Symbol 83122-XXX		Page 12 of 14
Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Summit Chemical Co.		
			Baltimore, MD		
			Sylorr Plant Corp.		
			St. Louis, MO		
			Sungro Chemicals, Inc.		
			Los Angeles, CA		
			Bio-Derm Laboratories, Inc.		
			Carrollton, TX		
			Mitsui Chemicals America, Inc.		
			Valdosta, GA		
			Y-Tex Corp.		
			Cody, WY		
			LHB Industries		
			St. Louis, MO		
			Management Contract Services, Inc.		
			Valdosta, GA		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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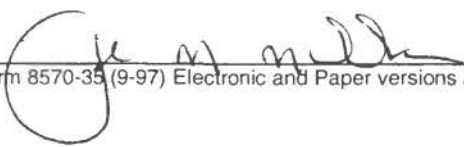


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Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			PM Resources, Inc.		
			Bridgeton, MO		
			Gharda USA, Inc.		
			Newtown, PA		
			LF Life Sciences, Ltd.		
			Brookfield, CT		
			Notable Solutions		
			Woodbridge, VA		
			Pro Products		
			Mahopac, NY		
			Univar USA, Inc.		
			Seattle, WA		
			Osmose New Zealand		
			Buffalo, NY		
			Regguide		
			Hillsboro, MO		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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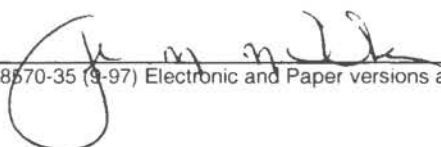
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Applicant's/Registrant's Name & Address Garnik Industries 484 Brown's Cove Road Ridgeland, SC 29936			Product PRO-TEK 50 Fabric Treatment		
Ingredient Permethrin					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Andrew Martin Co. NV. Inc.		
			Goodyear, AZ		
			Green Light Company		
			San Antonio, TX		
			Non-Dietary Exposure Task Force		
			Washington, DC		
			Sergeant's Pet Care Products		
			Egan, MN 55122		
			Quest Chemical Corp.		
			Houston, TX 77041		
			Fiebing Company		
			St. Louis, MO		
Signature 			Name and Title Jane M. Miller, Agent for Garnik Industries		Date Feb. 21, 2006

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Data Matrix Footnotes for 83122-XXX

20405

1. Not required at this time for this end-use product.
2. Not applicable. Neither the active ingredient nor the inert ingredient is considered a strong oxidizing or reducing agents.
3. Not applicable. The product does not contain combustible liquids.
4. Not applicable. Neither the technical grade active ingredient nor the inert ingredients are considered as potentially explosive.
5. The end-use product is compatible with polyethylene plastic bags.
6. Not applicable. Product is not intended to be diluted with petroleum solvents.
7. Not applicable. The product is not corrosive to its commercial packaging.
8. Not applicable. Product is not intended for use around electrical equipment.
9. Not applicable. Product is not a liquid.

United States



Environmental Protection Agency
Washington, DC 20460

Formulator's Exemption Statement

(40 CFR 152.85)

Applicant's Name and Address

Garnik Industries
484 Brown's Cove Road
Ridgeland, SC 29936

EPA File Symbol/Registration Number

83122-XXX

Product Name

PRO-TEK 50

Date of Confidential Statement of Formula (EPA Form 8570-4)

February 22, 2006

As an authorized representative of the applicant for registration of the product identified above, I certify that:

(1) This product contains the following active ingredient(s):

Permethrin

(2) Of these, each active ingredient listed in paragraph (4) is present solely as the result of the use of that active ingredient in the manufacturing, formulation or repackaging another product which contains that active ingredient which is registered under FIFRA Section 3, is purchased by us from another producer, and is labeled for at least each use for which my product is proposed to be labeled.

(3) Indicate by checking (A) or (B) below which paragraph applies:

☒ (A) An accurate Confidential Statement of Formula (EPA FORM 8570-4) for the above identified product is attached to this statement. That formula statement indicates, by company name, registration number, and product name, the source of the active ingredient(s) listed in paragraph (1).

OR

☐ (B) The Confidential Statement of Formula (CSF) (EPA Form 8570-4) referenced above and on file with the EPA is complete, current, and accurate and contains the information required on the current CSF.

(4) The following active ingredients in this product qualify for the formulator's exemption.

Source

Active Ingredient	Product Name	Registration Number
Permethrin	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]

Product ingredient source information may be entitled to confidential treatment

Signature

Name and Title

Date

Jane M. Miller Agent to Garnik Industries

2/22/06

